The State Hub Roadmap: CDSS CalFresh and CalWORKs Streamlining Verifications

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Acknowledgments

Social Interest Solutions (SIS) would like to thank CDSS for its leadership in streamlining access to CalFresh and CalWORKs, and potentially other programs in California that support individuals and families in need, by reducing the burdens of the verification process for both clients and program staff. SIS would also like to thank all of the experts from the numerous state, county, and consumer advocate entities in California and around the nation who gave so generously of their time and ideas to support this effort.

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1 Executive Summary

The California Department of Social Services (CDSS) has made important advancements in streamlining access to the CalFresh and California Work Opportunity and Responsibility to Kids (CalWORKs) programs over the past several years, particularly in the application and interview processes. As part of its ongoing commitment to continuously streamline access to benefits by Californians in need of assistance, CDSS is exploring electronic options to help streamline and modernize the processes for obtaining required verifications for CalFresh and CalWORKs eligibility. These efforts could also benefit clients and staff of other programs in California, such as Medi-Cal and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), that serve similar populations and have verification requirements similar to those of CalFresh and CalWORKs.

To assist in this effort, CDSS engaged Social Interest Solutions (SIS) to carry out an intensive research and analysis project to develop this State Hub Roadmap (Roadmap) for CDSS's consideration. This project included:

1. An analysis of the current environment of eligibility verifications;
2. An alternatives analysis of electronic verification systems being used in California and other states;
3. Extensive stakeholder engagement activities, including interviews, site visits, focus groups, and working sessions; and
4. Recommendations for consideration in the short, medium, and long term.

Rather than a single solution, this Roadmap provides a complementary set of options for CDSS and its partners to consider for implementation that would, over time, foster improvements for clients and program staff through policy, operational, and technology advances.

KEY FINDINGS

The research, analysis, and stakeholder engagement activities informed a comprehensive assessment of the current environment that supports CalFresh and CalWORKs verifications.

The current environment presents multiple challenges for clients and program staff:

- **Complexity and variability in policy, operations, and technology**
  - Not only are the federal and state policy requirements for CalFresh and CalWORKs verifications complex, but they also vary between the two programs.
  - Because the programs are operated locally by county welfare departments in each of California's 58 counties, business practices differ across counties.
  - Eligibility workers in each county generally have access to well over a dozen electronic data-verification sources, many of which must be accessed through a variety of separate websites and other tools.
  - Multiple systems support eligibility verifications. Some systems are consistently used statewide, such as the Applicant and Recipient Income and Eligibility Verification Systems (IEVS). Others are available statewide, but not consistently utilized in each county. Counties may also have access to local data sources and have adopted local solutions for functions such as document imaging and management.
  - Certain eligible client populations, including individuals who are college students, non-citizens, and/or homeless, often face particular verification challenges.
- **Lack of timely electronic data:** Available data is not always useful or easily accessible for a timely eligibility determination, often leading to the need for paper documentation from clients.
- **Burdensome, repetitive manual processes:** The current environment for CalFresh and CalWORKs verifications is inefficient and slow, imposing a barrier to expedited processing. Limitations include unfiltered and duplicate data, multiple user logins, and lack of automation.
- **Burdensome, inefficient paper document processes:** Paper documentation remains a common means of verification. Processing these documents is challenging due to document-imaging delays, the lack of a statewide document repository, and the underutilization of document-management tools and techniques.

In sum, the current environment that supports the verification processes for CalFresh and CalWORKs is a tangled web of data sources, systems, and access points that have significant variability throughout the state, making the process overly complicated and resulting in significant challenges for clients and program staff. Because other health and social services programs in California, such as Medi-Cal and WIC, have similar verification requirements, these challenges are exacerbated for individuals and families eligible for multiple programs.

RECOMMENDATIONS

Despite the complexities and challenges within the current environment, with the right leadership, partnerships, approaches, and tools, advancements can be made in both the near and long term. This important opportunity to promote access to benefits by Californians in need of assistance, and to achieve significant cost and time savings for both clients and staff, warrants the leadership and resource investments needed to ensure success.

In this report, we have laid out a set of options and opportunities for consideration, as well as a list of key characteristics for fast, accurate, and efficient verifications that would benefit both clients and program staff. After a thorough analysis of the main challenges and hurdles of the current environment, and a review of existing and potential alternatives, we developed these recommendations in consideration of feasibility, ease of transition, and potential for impact, including impact for clients and program staff of other health and social services programs.

Key Objectives

In order to define the best environment to support fast, accurate, and efficient verifications, we identified the following key objectives:

- **For clients:**
  - Clarity about verification requirements and how to comply with them;
  - Transparency regarding the status of their verifications and the basis for verification results;

    - Reduced need for paper documentation, including repetitive requests for documents that have already been provided and remain valid; and
    - Multiple means of easily submitting verification documents when they are needed, including online submission, submission via mobile devices, and self-service scanning options in county offices and community locations.
- **For program staff:**
    - Clarity about verification requirements and how to exercise their discretion in satisfying them quickly, accurately, and efficiently given the client's circumstances;
    - Access to only the electronic information that is relevant to a client's eligibility and only at the time it is needed for expedient processing;
    - Sufficient transparency regarding verification results from electronic data matches to help resolve potential verification discrepancies; and
    - Efficient access to and processing of documents provided by clients.

Achieving these objectives will require a clear vision and coordinated technical and non-technical changes, including changes in governance, policy, and operations. CDSS coordination with its partners and stakeholders, including other state agencies, counties, and consumer advocates, will be essential to achieving advancements for CalFresh and CalWORKs that can also be leveraged across other California health and social services programs. Our technical recommendations include enhancements to existing systems that would streamline the verification experience for clients and program staff, offer better access to available data sources, and create a new centralized and secure means of facilitating appropriate data sharing efficiently. Our non-technical recommendations include the creation of a statewide, client-centered vision for CalFresh and CalWORKs eligibility, which would promote cross-program alignment and guide decision-making toward a desired future environment that supports both CalFresh and CalWORKs verifications

Technical Recommendations

We have considered multiple factors in developing technical recommendations, including: complexity and cost to implement and maintain; integration challenges and

other risks; potential for reuse or leverage by other programs in California; currency and quality of data delivered; and degree of policy, operational, and cultural change required for successful adoption. We recommend that CDSS work with partners and stakeholders on three sets of technical initiatives, each of which require associated policy and operational changes:

- **Enhancements to existing systems**
  - As the Statewide Automated Welfare System (SAWS) continues to evolve, undertake a user-centered design initiative to streamline the online verification experience for clients and program staff. For example, efforts may include tools that make it easier for clients, including specified populations that face particular verification challenges, to understand what verifications are needed, upload appropriate documents correctly, and get updates on verification status.
  - Expand and enhance centralized document-imaging and -management tools that facilitate the processing of paper documents and reduce the need for clients to provide the same or similar documents on multiple occasions.
- **Better access to available data sources**
  - Expand statewide access to, and appropriate use of, data sources that provide more current data on a real-time basis when requested.
  - Use filtering techniques to reduce the flow of older, less relevant data that causes unnecessary effort for clients and program staff.
- **A centralized state verification hub**
  - Develop a new state verification hub that centralizes and facilitates appropriate access to electronic data for authorized users.
  - Over time, this hub would replace the complex array of technical approaches that currently exist, promoting fast, efficient, and accurate verifications.
  - The hub would have the capacity to provide verification services for additional health and social services programs in order to further reduce duplicative verification efforts for individuals and families who are eligible for multiple programs.

Non-technical Recommendations

For non-technical recommendations, we have identified strategies that could help address gaps in the current environment regardless of the specific technical solutions adopted by CalFresh and CalWORKs. The recommendations center on a statewide vision that is reinforced through governance, policy, and operations.

- **Statewide vision:** Clearly articulate a statewide, client-centered vision of the desired CalFresh and CalWORKs eligibility experience and outcomes. Use this vision to create context for and guide decision-making about the governance, policy, operations, and technology needed to support CalFresh and CalWORKs verifications.
- **Governance structures:** Formalize coordination on matters of common value across agencies, departments, programs, systems, and stakeholders, such as data-sharing agreements, business processes, and a shared technology infrastructure.
- **Policy changes and clarifications:** Promote alignment and standardization, including policy alignment across programs.
- **Operational changes:** Advance performance and evidence-based decision-making, through metrics, tools, and trainings.

A Phased Approach

Understanding the complexities and nuances that are inherent to government agencies, particularly in implementing large-scale technological advancements, we recommend a phased approach that would achieve the desired future environment over time, in the following stages:

- **Stage 1 – Lay the Foundation (Near-Term Recommendations, Years 0-2):** CDSS should immediately begin working with the California Health and Human Services (CHHS) Agency Information Office, Office of Systems Integration, key partners, and other stakeholders to test a governance model charged with building a proof of concept, or prototype, for the new state hub within one year. This proof of concept would allow for the testing of new governance structures, technical infrastructure, coordinated data-sharing agreements and access controls, and automated rules. In parallel, we recommend CDSS develop and implement

foundational policy and operational changes, prioritizing: 1) a clear expression of a statewide, client-centered vision for CalFresh and CalWORKs eligibility, which would guide subsequent decision-making; 2) policy changes and clarifications that can be implemented in the current environment; and 3) policy changes and clarifications that would constitute requirements for the new state hub. We recommend CDSS use these efforts to inform planning for the new state hub and other changes to the technical environment. We additionally recommend CDSS work with counties to: 1) undertake a user-centered design initiative to streamline the SAWS portal verification experience for clients and program staff; and 2) expand and enhance centralized document-imaging and -management tools that facilitate the processing of paper documents and reduce the need for clients to provide the same or similar documents on multiple occasions.

- **Stage 2 – Learn, Plan, and Implement Direct Access (Medium-Term Recommendations, Years 3-5):** Using built-in performance metrics from the proof of concept, evaluate findings and create a detailed plan for the continued state hub build and execution of changes in non-technical areas. Design and implement a direct-access approach to the state hub, allowing authorized users to access verification data from multiple sources through a single secure web portal. Roll out a pilot initiative for county workers and other users (e.g., authorized staff of programs such as WIC; consumers) before launching statewide. Gradually migrate existing data matches, such as those currently performed via Applicant IEVS and Recipient IEVS, onto the state hub. Continue to implement policy and operational changes while monitoring performance throughout.
- **Stage 3 – Integrate with the California Statewide Automated Welfare System (CalSAWS) (Long-Term Recommendations, Years 6-10):** Continue to build the state hub and internal structures, based on findings from the previous years. Design and implement integration with CalSAWS, California's planned single statewide SAWS system onto which all counties will eventually migrate. This timeline allows CalSAWS migration to be completed prior to integration with the state hub, while also allowing county workers to gain many of the advantages of the state hub through the Direct Access approach. Direct access for county workers can be maintained after CalSAWS integration in order to provide them with flexibility (e.g.,

continued access to the state hub in the event CalSAWS is temporarily unavailable).

CONCLUSION

CDSS and its partners across the state have come a long way in streamlining the environment of eligibility and enrollment for California's vulnerable families, but also know that more needs to be done. The advancement and modernization of the verification processes for CalFresh and CalWORKS will have a meaningful impact on the landscape, with positive effects spanning across program staff, agency partners, and clients. A smart, effective shift has the potential to save millions of dollars and countless hours in operations, align several agencies' goals and systems, and quickly, easily, and efficiently connect eligible Californians to the critical benefits they need.

In partnership with key stakeholders, we have laid out the challenges and opportunities of the current verification environment, provided a thoughtful review of potential alternatives, and identified ambitious but realistic recommendations to pursue in the near, medium, and long term. It is our hope that this Roadmap provides a clear and bright path forward.

2 Introduction

The California Department of Social Services (CDSS) is exploring electronic options to streamline and modernize the processes for obtaining required verifications for CalFresh and California Work Opportunity and Responsibility to Kids (CalWORKs) eligibility. The goal is to make the verification process fast, accurate, and efficient for both clients and program staff.

To assist in this effort, CDSS engaged Social Interest Solutions (SIS) to carry out a State Hub Roadmap project. The project included an analysis of the current environment of eligibility verifications for CalFresh and CalWORKs, an alternatives analysis of electronic verification systems being used in California and other states, and the development of recommendations for moving forward in the short, medium, and long term. The project was informed by stakeholder insights gained through an extensive set of stakeholder-engagement activities, including interviews, focus groups, site visits, and working sessions. Through these activities, a total of more than 100 individuals representing multiple state, county, and consumer advocacy entities provided technical, policy, operations, and other subject matter expertise.

This Roadmap report summarizes the activities, methodology, and results of the State Hub Roadmap project. It describes the current environment that supports CalFresh and CalWORKs verifications and captures key findings about challenges in the current environment that impede fast, accurate, and efficient verifications for clients and program staff. It then provides a set of recommendations for moving forward, based on an assessment of available alternatives. Ultimately, CDSS, working with other stakeholders, will make the final decisions about the recommendations and execute changes to streamline the verification process for clients and program staff.

3 Project Activities and Methodology

This Roadmap was informed by the following project activities:

- A review of federal, state, and county regulations, policy, and guidance;
- A review of existing data-sharing agreements, architecture diagrams, data dictionaries, and other technical documents;[1] and
- Insights provided by stakeholders through the stakeholder-engagement process. For example:
  - Interviews with subject-matter experts in the policy and technologies used during the current verification processes;
  - A working session with over 30 state and county representatives with technical subject-matter expertise on the IT systems used in the verification process;
  - On-site observation and interviews at local county offices with county workers and customer-service centers in two counties;
  - A focus group with representatives from organizations that provide direct services to CalFresh and CalWORKs clients and/or advocate on their behalf;
  - Two focus groups with county health and human services staff overseeing the CalFresh and CalWORKs programs in 13 of the 58 counties in California; and
  - A final working session with stakeholders from prior activities to discuss identified gaps and proposed alternatives found to date, ensuring that the final Roadmap reflects the expertise and diversity of perspectives that are critical to success.

EVALUATION CRITERIA

These project activities enabled us to assemble a comprehensive view of the current environment that supports CalFresh and CalWORKs verifications and identify key findings about challenges in the environment that impede fast, accurate, and efficient verifications for clients and program staff. The current environment and key findings are summarized below (see sections 4 and 5). To formulate recommendations for

addressing those findings, we used insights gained from the project activities to identify technical and non-technical alternatives. We assessed the technical alternatives based on the following criteria:

- **Relevance:** The degree to which the alternative would provide data that is useful in eligibility verifications for CalFresh and CalWORKs, including data that is sufficiently current and of sufficient quality for workers to rely on it as a means of verification;
- **Impact:** The alternative's overall potential for positive impacts on CalFresh and CalWORKs verification processes;
- **Degree of Process Change:** The extent and complexity of operational changes that would be needed to realize the full potential of the alternative;
- **Complexity of Implementation:** The technical complexity of implementing the alternative, including the degree of customization that would be required;
- **Constraints and Risks:** The extent to which the alternative is likely to be affected by other factors in the technical environment, such as associated changes to other systems that may be required and inter-dependencies with other IT initiatives that are planned or in progress;
- **Maintainability:** The effort required to keep the verification source up to date and maintain the alternative as requirements and capabilities change over time;
- **Non-Technical Considerations:** The degree of policy, operational, and cultural change required for successful adoption;
- **Currently Available in Other California Program(s):** Whether the alternative is currently in operation or in the process of being adopted for use in one or more programs in California, beyond CalFresh and CalWORKs;
- **Potential for Re-Use in Other California Programs:** The potential for the alternative (if adopted) to be leveraged by other programs in California, beyond CalFresh and CalWORKs;
- **Implemented in Other States:** The extent to which the alternative is already in use outside of California;
- **Industry Best Practice:** Whether the alternative is considered an industry best

practice that has proven successful in other environments;

- **Technical Maturity:** The degree to which the technology is sufficiently established in the marketplace to have common standards and a skilled workforce to facilitate adoption and maintenance;
- **High-Level Cost Assessment:** A high-level assessment of the costs required to adopt the alternative, including costs to procure, design, develop, and implement the solution;[2] and
- **Time to Implement:** The relative amount of time needed to successfully adopt the alternative, including time to procure, design, develop, implement, and operationalize the alternative.

4 Current Environment

The CalFresh and CalWORKs programs are California's version of the federal programs known as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF). CalFresh issues monthly food benefits to low-income people who meet federal income eligibility rules. These benefits can be used to buy most foods at many markets and food stores. CalWORKs provides cash aid and employment services to eligible families that have a child(ren) in the home. Both programs serve individuals and families across all 58 counties in the state and are operated locally by county welfare departments. In determining eligibility for CalFresh and CalWORKs, county workers must verify the accuracy of information provided regarding an individual's or family's circumstances.

The current environment that supports CalFresh and CalWORKs verifications is complex and variable. Complex federal and state policy requirements vary somewhat between the two programs. Both programs are operated locally by county welfare departments in each of California's 58 counties, using business practices that vary across counties. Eligibility workers in each county commonly have access to well over a dozen electronic verification data sources, many of which must be accessed manually through a variety of websites and other tools. Different data sources are available across the counties, and access to data sources sometimes varies even within a county. There are also multiple systems supporting eligibility verifications, including statewide systems like the Applicant and Recipient Income and Eligibility Verification Systems (IEVS), the Medi-Cal Eligibility Data System (MEDS), the Statewide Automated Welfare System (SAWS), and local solutions for functions such as document imaging and management.

This section summarizes the verification requirements and processes for CalFresh and CalWORKs. It also describes the major verification systems and data sources generally used to support verifications in the two programs. Note that the specific processes and systems used in each county may vary from the general description provided here. A detailed analysis of the current environment in each county was beyond the scope of this project.

4.1 DETERMINING ELIGIBILITY FOR CALFRESH AND CALWORKS

CalFresh and CalWORKs limit eligibility based on income and other factors. A household must have net monthly income below 100% of the federal poverty level (FPL) to be eligible for CalFresh.[3] Households that qualify for CalFresh through California's implementation of Broad-Based Categorical Eligibility (BBCE) may have gross monthly income up to 200% FPL.[4] CalWORKs provides cash aid to families with children under 19 with one caretaker or parent whose monthly countable income is below the Minimum Basic Standard of Adequate Care (MBSAC) limit, which varies by household size and region.[5] Both programs also require eligible individuals to be a California resident, as well as a U.S. citizen or have satisfactory immigration status, and meet other eligibility criteria.

For most households, county workers determine and reassess CalFresh and CalWORKs eligibility at a minimum of three regular intervals for each case during a typical year-long certification period: 1) at the time that the individual or family initially applies, which is known as the initial certification/application; 2) at the sixth month, when the individual or family is required to provide a periodic report by completing the SAR 7 form; and 3) at the twelfth month, during the annual recertification/redetermination.[6] County workers also reassess CalFresh and CalWORKs eligibility when they receive actionable eligibility information between these three regular intervals, which are known as mid-period reports. The eligibility determinations and reassessments performed in conjunction with initial certification/application, periodic reports, recertification/redetermination, and mid-period reports require county workers to verify the accuracy of eligibility information. Thus, county workers perform verifications multiple times in a single year for each case.

Under federal and state rules, certain eligibility information must be verified at initial certification/application, at annual recertification/redetermination, and whenever eligibility is reassessed based on a change to eligibility information reflected in a periodic report or mid-period report. Figure 1 summarizes the information that is verified when CalFresh and CalWORKs eligibility is assessed.

Figure 1. CalFresh/CalWORKs Verification Requirements[7]

CalFresh	CalWORKs
MANDATORY	
• SSN • Identity • Income • Immigration Status • State Residency **If applicable:** • Disability • Child Support • Student Exemptions • Medical Expenses • Sponsor	• SSN • Identity • Income • Immigration/Citizenship Status • State Residency • Resources • Immunization • School Attendance **If applicable:** • Pregnancy • Sponsor
OPTIONAL/IF QUESTIONABLE	
• Utility Expenses • Household Composition • Citizenship Status • Able Bodied Adult Without Dependents (ABAWD) • Shelter Costs • Dependent Care Expenses • Household Size • Resources	

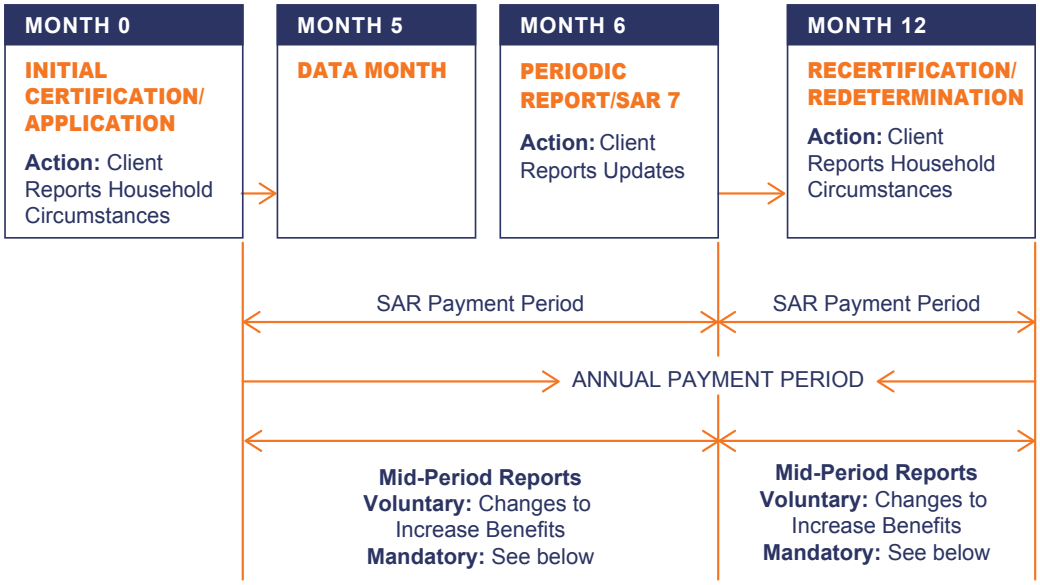
County workers generally use four verification methods:

- Electronic match with trusted public or private data sources, such as the Employment Development Department (EDD);
- Paper documents, such as a pay stub;
- Collateral contacts in person or by phone with third parties, such as employers; and
- Client statements and self-certifications.[8]

Figure 2 provides an overview of the process and timelines for a typical annual certification period in CalFresh and CalWORKs. Details of the specific process and systems used for verification when eligibility is determined and reassessed – including

at initial certification/application, the periodic report, recertification/redetermination, and the mid-period report – are discussed below.

Figure 2. CalFresh/CalWORKs Certification Period



Mandatory Mid-Period Reporting
CalFresh: IRT, Decrease of work hours below 20 hrs/week for ABAWD
CalWORKs: IRT, fleeing felon status, violation of probation/parole, address changes, and changes in household composition for AR/CO

4.1.1 Initial Certification/Application

Individuals may apply for CalFresh and/or CalWORKs benefits in person, by mail using a paper application, or online using an electronic application.[9] Paper application forms include the SAWS 1 and SAWS 2 Plus, which can be used to apply for both CalFresh and CalWORKs, and the CF285, which is an application for CalFresh only. Electronic applications are available on the SAWS consumer portals: MyBenefitsCalWIN; YourBenefitsNow!; and C4Yourself. Applicants can begin the process by submitting a signed application that provides a minimum set of information as specified on the form (e.g., for CalFresh, the application must include at least the applicant's name, address, and signature). Applicants must provide additional information to complete the application so that county workers can determine eligibility and the benefit amount.[10] The application instructions

also inform individuals as to what types of documents are needed to verify certain eligibility criteria.[11] Individuals have multiple opportunities to submit verification documents during the eligibility determination process, including attaching copies of the relevant documents to the application at the time of application; providing verification documents during the required interview; and mailing, uploading, faxing, or hand-delivering documents any other time during the process.

4.1.1.1 File Clearance & Application Registration

When the county initially receives the application, it initiates the verification process. In a process known as "file clearance," county workers use MEDS to determine if there is a prior record of the household having received benefits in the state. If a household member included on an application has a prior case record in MEDS (or is known to MEDS), county workers can use the MEDS data to electronically verify certain eligibility criteria, such as SSN, date of birth (DOB), and state residency.[12] The application is then registered in SAWS and assigned a case number.

Once an application is registered, a request to Applicant IEVS is submitted for every member of the household who is applying and any other individuals whose income or resources are considered in determining eligibility and the amount of benefits, if the SSN has been obtained.[13] The request to Applicant IEVS may be automatically sent via SAWS and/or manually initiated by a county worker via SAWS or MEDS.[14] County workers may also access other electronic verification sources at this point and/or may do so before or after the interview as part of the eligibility determination process. See below for additional details about Applicant IEVS, other electronic verification sources, and the interview and eligibility determination process.

4.1.1.2 Request for Verification

County workers review the application and any verifications provided by the applicant or obtained electronically to determine if they need additional information to resolve discrepancies and complete an eligibility determination.

As part of the initial processing or mandatory interview process, county workers will notify individuals about what additional information or documents they need. A Request for Verification notice (known by the form number, CW 2200) is provided in writing.[15] Individuals can provide the required documentation to the county via fax, mail, the SAWS consumer portal, or in person.[16] If the applicant does not provide required information within 10 days of the notice, the county can deny the application.[17] Sometimes, multiple requests and submissions may be required. For example, an applicant may be confused by the notice and submit incomplete information or a worker may determine that additional information is required to clarify a complex case.

4.1.1.3 Verifying Eligibility

The county worker is responsible for determining whether the information provided on the application is verifiable and accurate. There are general guidelines as to what types of documentation can be used to verify eligibility information. These guidelines provide workers with a degree of flexibility to satisfy verification requirements based on the information available to them. If all household circumstances can be verified based on reliable paper documents provided by the applicant, eligibility can be approved without the need to verify electronic data sources. If either the existing electronic data or paper documentation raises further questions – i.e., is *questionable* – county workers may request additional documentation from individuals.[18]

Information on the application is questionable for CalFresh and CalWORKs if it is:

- Inconsistent with statements made by the applicant;
- Inconsistent with other information in the application or previous applications; or
- Inconsistent with information received by the county welfare department.[19]

4.1.1.4 Interview and Eligibility Determination

At initial certification/application, an interview with the head of household is required.[20] If verification of all eligibility criteria remains incomplete and/or any submitted documentation appears questionable, the county worker often will use the interview as an opportunity to seek clarification or additional documentation. During the interview, county workers ask questions to help estimate the client's income for the certification period in order to determine eligibility and benefit amounts and help clients avoid potential overissuances/overpayments that they would have to repay. Having the most current data and a better understanding of the household's current and anticipated circumstances allows the county worker to determine eligibility and calculate benefits for the certification period more accurately.[21]

Once the interview has been completed, and all eligibility criteria are satisfactorily verified, the county worker can determine CalFresh and CalWORKs eligibility via SAWS. If an applicant is found eligible, the county worker will determine the benefit amount, issue a written approval notice, and provide an Electronic Benefits Transfer (EBT) card that allows the client to use their benefits.

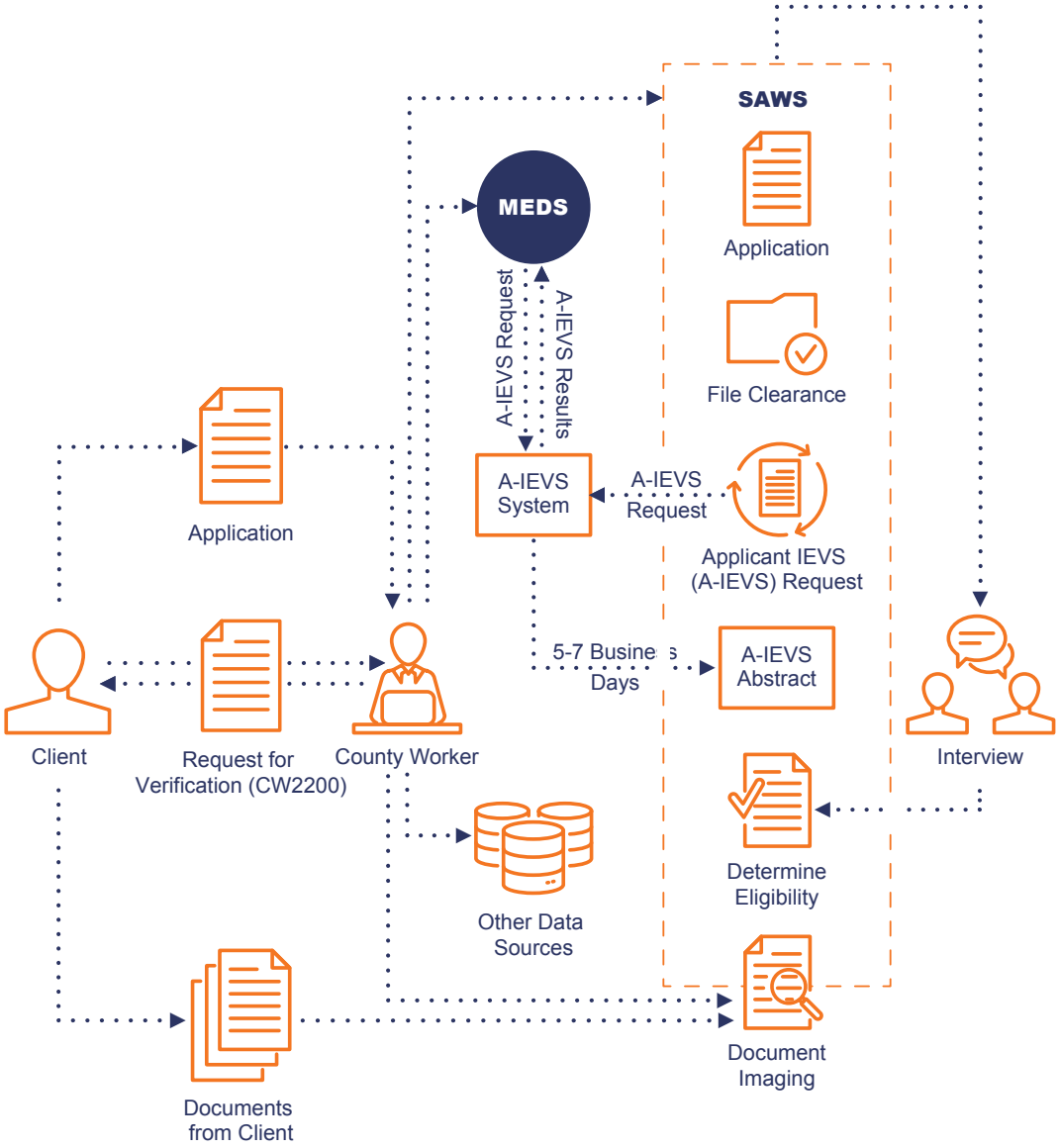
Figure 3 below is a simplified illustration of the initial certification/application process. The key steps involved are as follows:

1. County worker logs into SAWS.
2. County worker begins processing of applications submitted by individuals and families by mail, in person, or via the SAWS consumer portal. The application is filed in SAWS, a case number is assigned, and an Applicant IEVS request is automatically generated.
3. County worker conducts file clearance by searching existing databases through SAWS and MEDS to determine if individual household members already have one or more existing records, or if a new Client Index Number (CIN) must be assigned. Workers must log in separately to MEDS and must manually transfer data from existing records into the

SAWS case record as needed.

4. County worker accesses and views the documents submitted by the individual and requests additional documents if necessary. In some counties, document images are processed and stored using software and a database that is separate from SAWS.
5. Applicant IEVS requests information from five data sources. Results from Applicant IEVS are viewable by the county worker via the MEDS system within 24 to 48 hours of the request.
6. The Applicant IEVS abstract, a single report with results from all data sources with matches, is electronically sent from MEDS to SAWS, usually within 5 to 7 business days after the request was made. The abstract is not posted to SAWS until results from all the data sources are available and can only be viewed as an image or document in SAWS.
7. If the abstract is not posted to SAWS at the time the county worker checks, the worker may look for Applicant IEVS results in MEDS. If results are not yet available in MEDS, the worker may submit an Applicant IEVS request manually in MEDS.
8. When the Applicant IEVS abstract is available in either SAWS or MEDS, the county worker reviews the data results and must manually enter the relevant Applicant IEVS data into the appropriate screen(s) in SAWS.[22]
9. A phone or in-person interview must be conducted. This may occur before all electronic verifications, such as Applicant IEVS requests, are complete. Verifications may be obtained from the client or clarified during the interview.
10. Once the application and verification processes are completed, the county worker runs the Eligibility Determination and Benefit Calculation (EDBC) in SAWS to determine eligibility for CalFresh and CalWORKs. Based on this determination, SAWS sends the appropriate notice to the client and notifies the EBT vendor to issue and mail an EBT card. Individuals also have the option to pick up the EBT card in the local county office.

Figure 3. Initial Certification/Application



4.1.2 Periodic Report

With certain exceptions, clients must submit a periodic report in the sixth month of the certification period.[23] Using the SAR 7 form, clients who receive CalFresh and/or CalWORKs benefits must report updated information about various eligibility factors, including changes in household members, changes of address and related costs, information about income (earned and unearned) received during the report month and expected in the upcoming six months, and information about property and other resources. The SAR 7 also has questions specific to each program. The

form instructs CalFresh recipients to report increases in medical and dependent care costs, as well as changes in child support payments. The form instructs CalWORKs recipients to report changes regarding family status, employment status, immigration status, child custody, and student status, as well as questions about warrants, probation, and parole.[24] The SAR 7 also instructs clients to include paper documentation of reported changes along with the form.

If a client fails to submit the SAR 7 by the due date, or it is incomplete, the county will send a notice to submit the SAR 7 or any incomplete information by the end of the sixth month.[25] If the client fails to provide the required information by the deadline, the county will discontinue benefits and issue a notice.[26] If the county finds good cause or there is a successful appeal, benefits may be restored.[27] If the information reported on the SAR 7 results in a change in benefits, the client is notified of the change and given the opportunity to appeal.[28]

4.1.3 Recertification and Redetermination

Recertification (CalFresh) or redetermination (CalWORKs) is the annual redetermination of eligibility and is generally the same process as the initial certification/application process (see Figure 3).[29] The household must complete a renewal application, verify information, and complete an interview.[30] Verification at recertification/redetermination is the same as at initial certification/application, except permanent information such as SSN, DOB, citizenship/immigration status, or residency do not need to be re-verified unless there is an inconsistency.[31] County workers must request Applicant IEVS data for verification purposes at recertification/redetermination, instead of using Recipient IEVS data.[32] Data from Recipient IEVS is used for purposes of periodic reports and mid-period reporting (see Section 4.2.3 for more information about Recipient IEVS).

4.1.4 Mid-Period Reporting

As clients' circumstances change over time, their eligibility and benefit amount for CalFresh and CalWORKs may also change. For example, significant changes in income are likely to result in changes in eligibility and benefit amount. It is

important to both clients and program administrators that eligibility determinations and calculations of benefit amounts are correct. For example, clients may be required to repay overissuances/overpayments they receive, which is a burden to them and creates administrative costs for the programs. Carefully constructed requirements for reporting changes and reassessing eligibility at times other than the periodic report and recertification/redetermination help to avoid these concerns.

California elected to implement simplified reporting for CalFresh and CalWORKs in 2013, which includes reduced reporting requirements outside of the periodic report and annual recertification/redetermination (aka mid-period reporting).[33] CalWORKs generally mirrors the CalFresh mid-period reporting requirements, with some exceptions.[34] Both programs require clients to report certain changes in eligibility information within 10 days of the change. In addition to these mandatory mid-period reporting requirements, clients may also voluntarily report changes in eligibility information mid-period. County workers also receive electronic verification information from the Recipient Income and Eligibility Verification System (Recipient IEVS) at different points in time during the certification period. Depending on the details of the information county workers receive, whether from clients or Recipient IEVS, they will either reassess eligibility (including performing the related verifications) when they receive the information or they will wait to do so until the next semi-annual report or recertification/redetermination.[35] Mid-period reporting requirements for clients and county actions mid-period are described in more detail below.

4.1.4.1 Client Mid-Period Reporting Requirements

CalFresh and CalWORKs clients must make a mid-period report within 10 days of certain changes. Both programs require a mid-period report when a household receives gross monthly income over its Income Reporting Threshold (IRT). (See below for more on IRT.) Each program also has additional mandatory mid-period reporting requirements. For CalFresh only, clients must also make a mid-period report if there is a decrease in work hours below 20 hours per week, averaged monthly, for any Able-Bodied

Adult Without Dependents (ABAWD) in the household.[36] For CalWORKs only, clients must also make a mid-period report if there is a change in any of the following:

- Fleeing felon status;
- Violation of conditions of probation or parole;
- Address; or
- Household composition, as specifically required under Annual Reporting/Child Only cases (AR/CO).[37]

In addition to these mandatory mid-period reporting requirements, clients may voluntarily report any other changes in their circumstances at any time mid-period or wait to report the change at their next periodic report or recertification/redetermination.[38]

Income Reporting Threshold (IRT)

When clients receive notice of their eligibility for CalFresh and CalWORKs, the notice includes instructions regarding mid-period reporting requirements and specifies the household's IRT amount. The IRT defines when the household must report an increase in income. Specifically, both programs require clients to report within 10 days if they receive gross monthly income above the IRT. Each program uses a different formula to calculate the IRT. The CalFresh IRT amount is equal to 130% FPL for the household size. The CalWORKs IRT for an assistance unit (AU) is the lower of two tiers. The two tiers include: 1) 55% FPL for a family of three, plus the amount of income last used to calculate the AU's monthly grant amount, and 2) The amount of income likely to render the AU ineligible for CalWORKs benefits. As a result of these formula differences, the CalFresh IRT is generally higher and changes less frequently than the CalWORKs IRT. For most households that receive both CalFresh and CalWORKs, only the CalWORKs IRT is provided in the notice so that they have one IRT to use for reporting purposes. However, when county workers receive a mid-period report reflecting an income change, they are required to use the actual IRT for the respective program. For example, a household receiving both CalFresh and CalWORKs may report a change in income above the IRT reflected in their notice of eligibility, as required. If the household's

Income Reporting Threshold (IRT) (cont.)

new gross monthly income is above the CalWORKs IRT but below the CalFresh IRT, the county worker is required to reassess CalWORKs eligibility and the monthly CalWORKs grant amount for CalWORKs right away. If the report of income over the IRT causes a change in the CalWORKs grant, it must also be acted upon for purposes of CalFresh. Otherwise, the county worker may wait to act on the mid-period report of income over IRT for CalFresh purposes until the next periodic report or recertification. If the household's new gross monthly income has been verified and is known to the county, the county worker must act regardless of whether the report of income over the IRT caused a change in the CalWORKs grant.

4.1.4.2 County Actions Mid-Period

In addition to mandatory and voluntary mid-period reports from clients, county workers also receive Recipient IEVS data mid-period. For example, county workers receive Recipient IEVS data about income, fleeing felons, and incarceration on a monthly basis. Additional details about Recipient IEVS are provided below (see section 4.2.3). Changes received from Recipient IEVS may have already been reported by the client; more commonly, the county worker receives information via Recipient IEVS that the client has not yet reported or that is not subject to mandatory client mid-period reporting requirements. County workers must evaluate Recipient IEVS results within 45 days of receipt to determine if the information impacts eligibility and if the client was required to report it. If the information is unclear, meaning the county worker cannot readily determine its impact on the household's continuing eligibility or its effect on the benefit amount, the county worker must request additional information from the client by issuing a Request for Information (CW 2200). For CalFresh, additional information is requested if the unclear information is less than 60 days old.[39]

County workers must take action on information they receive mid-period, whether from the client or from other sources like Recipient IEVS, as follows:

1. For both CalFresh and CalWORKs, county workers must act on any voluntarily reported information that would increase the household's benefits, including verifying the information.[40]

2. For CalFresh, county workers must only act on information that would decrease benefits in four circumstances:

    a) The household has voluntarily requested that its case be closed.

    b) The county worker has information about the household's circumstances considered Verified Upon Receipt (VUR). See below for more on VUR.

    c) A household member has been identified as a fleeing felon or parole violator.

    d) There has been a change in the household's CalWORKs grant.[41]

3. For both CalFresh and CalWORKs, county workers must also act on information that is subject to mandatory mid-period reporting requirements (see above).[42]

4. For both CalFresh and CalWORKs, county workers are also required to act on certain changes in eligibility status mid-period. These changes, known as "county initiated mid-period actions," are mass changes and/or changes that the client does not need to report, such as a Cost of Living Adjustment or a change in eligibility criteria due to legislative or regulatory action.[43]

5. Otherwise, county workers must not act on changes that would result in a decrease in the household's benefits, but should instead wait to address the information in the next periodic report or during recertification/redetermination, unless the client voluntarily requests to close the case.[44]

Actions on changes mid-period require the same general client notices as other actions. If the county worker needs additional verification, the county

worker will mail the Request for Information (CW 2200 form) to the client, who has 10 days to respond.[45] If the worker does not receive the required verification by the deadline, benefits may be reduced/discontinued with timely and adequate written notice to the client. The reduction/discontinuance can be appealed.[46] If the mid-period report and verification otherwise results in a change in benefits, the client is notified of the change, with opportunity to appeal.[47]

Verified Upon Receipt (VUR)

VUR is a SNAP/CalFresh designation that is given to information reported to the county that is: (1) obtained from the primary source; (2) complete; (3) not questionable; and (4) requires no further verification. A primary source is often considered the official system of record from either federal or state government agencies. Examples include the data files provided by the Social Security Administration (SSA), the United States Citizenship and Immigration Services (USCIS), or a state's unemployment agency. For purposes of eligibility verification, if the information came from a data source considered the primary source and otherwise meets the definition of VUR, the eligibility worker can act on that information without further contact with the client. For example, county workers must consider changes in unearned income reported from SSA (e.g., through Applicant IEVS or Recipient IEVS) as VUR.

The VUR provision may help streamline verification in most cases by eliminating the need to obtain additional documentary evidence or otherwise verify eligibility information. However, the VUR provision may also trigger additional mid-period eligibility assessments, because county workers must take action on information they receive mid-period that is considered VUR (e.g., monthly unearned income data from the Payment Verification System match that is part of Recipient IEVS). If this information results in a change to the client's benefits, notice must be provided so that the client has an opportunity to dispute the change.

4.2 VERIFICATION SYSTEMS USED BY CALFRESH AND CALWORKS

4.2.1 Statewide Automated Welfare Systems (SAWS)

County workers use SAWS to determine eligibility for CalFresh, CalWORKs, and

Medi-Cal. Currently, SAWS consists of three separate eligibility systems:

- LEADER Replacement System (LRS, now known as CalACES South) – covering Los Angeles County and 30% of the statewide caseload;
- Consortium IV (C-IV, now known as CalACES North) – covering 39 counties and 30% of the statewide caseload; and
- California Work Opportunity and Responsibility to Kids Information Network (CalWIN) – covering 18 counties and 40% of the statewide caseload.[48]

Each SAWS system has its own web portal for county workers with role-based access and interfaces with other systems and applications, and a consumer portal where individuals can create an online account, find information, apply online, and electronically submit documents. The three SAWS systems operate independently and do not directly exchange information with each other, except for limited communications for purposes of inter-county transfers (ICT).

By 2023, the three SAWS systems will become one statewide system known as CalSAWS. Currently, the LRS and C-IV systems are being merged into one system, the California Automated Consortium Eligibility System (CalACES).

Figure 4. Current SAWS Environment

4.2.2 Applicant IEVS

Applicant IEVS is one of two Income and Eligibility Verification Systems (IEVS). Under federal rules, every state must verify eligibility for SNAP, TANF, and Medicaid using IEVS.[49] In California, Applicant IEVS is primarily used to

verify eligibility for CalFresh, CalWORKs, Medi-Cal, and General Assistance/ Relief.

Applicant IEVS, which is administered by the California Department of Health Care Services (DHCS), relies on five different data sources.[50] These sources are the Social Security Administration (SSA), MEDS, the Franchise Tax Board (FTB), EDD, and the U.S. Citizenship and Immigration Services (USCIS).

The specific data flow in Applicant IEVS is as follows:

1. An Applicant IEVS request can be made by the county worker directly via a MEDS terminal, but more often is requested via SAWS, which sends all Applicant IEVS requests on a daily basis to MEDS in a nightly batch via DHCS' network connections.

    a) The Applicant IEVS request requires the county worker to provide, at a minimum, the household member's name, SSN, and DOB.[51] These factors will be used as match criteria.

    b) An Applicant IEVS request is made for all household members who are applying and any other individuals whose income or resources are considered in determining eligibility and the amount of benefits, if the SSN has been obtained.[52]

2. The Applicant IEVS process is a daily batch job. The individual's information is compared against all the data sources within Applicant IEVS. If there is a match, results of the match are sent from the data source to MEDS in batch.

3. Results from Applicant IEVS are posted online in MEDS as the data becomes available, generally from all data sources within 24 to 48 hours of when the request was sent to MEDS.

4. When the Applicant IEVS system has received results from all data

sources, the results are summarized and sent electronically to the counties within 5 to 7 business days of the request for review by the county workers. The summary of Applicant IEVS results is referred to as the Applicant IEVS abstract.

5. The county worker can print a hard copy of the Applicant IEVS abstract to review, or view the abstract as an image in SAWS. The data from the Applicant IEVS abstract cannot be electronically sent to SAWS in a format that would allow the data to populate within SAWS automatically. Instead, any data from the Applicant IEVS abstract must be read and manually keyed in by the county worker in the appropriate fields within SAWS.

The county worker is often able to use the results of Applicant IEVS to electronically verify unearned income from sources such as SSA or EDD. However, earned income data available via Applicant IEVS – primarily from EDD wage data – does not reflect the current or last month's income, but instead includes wage data from the prior quarter, and only for employers who report wage data to EDD. Based on the current data available via Applicant IEVS, county workers primarily use it to verify unearned income, to confirm there are no household members who are aided in another state, and to check citizenship and immigration status.

Because county workers are able to request Applicant IEVS at any point in time, some counties are currently using Applicant IEVS at recertification/redetermination. In addition, CDSS will be issuing formal guidance to all counties to use Applicant IEVS at the time of recertification/redetermination.[53]

4.2.3 Recipient IEVS

Recipient IEVS is the second IEVS system. Administered by CDSS, Recipient IEVS consists of ten separate data matches of existing clients against various data sources at different points in time during the year, through both manual and automated processes.[54] (See Figure 5 for a summary of the data

matches performed via Recipient IEVS.) Recipient IEVS provides counties with data related to a variety of eligibility criteria from state and federal external data sources.

The results from automated Recipient IEVS matches are electronically sent to SAWS based on the interval of the match (e.g., Payment Verification System [PVS] data is transmitted monthly). Once received, SAWS will notify the county worker that there is new data to review for that case. Although the county worker can view the results from Recipient IEVS within SAWS, they must either copy and paste or manually enter the relevant information into the appropriate SAWS screen in order to evaluate the impact of the new data and recertify eligibility (via EDBC) as appropriate.

Data from Recipient IEVS is automatically pushed to SAWS from different verification sources at different time intervals. The specific data flow in Recipient IEVS is as follows:

1. Each of the external data sources that comprise Recipient IEVS post periodical files in the Secure File Transfer (SFT), which is managed by the California Department of Technology (CDT).
2. CDSS downloads the files as they become available and matches them against the monthly Medi-Cal Master Extract File (MMEF) that comes from MEDS, which is administered by DHCS.
3. Matched files from each Recipient IEVS data source are regularly posted to SFT, which is accessible via the three SAWS systems. The data is stored in individual county folders for ease of access.

Although the majority of data from Recipient IEVS is electronically available to the counties, some data, such as Federal Tax Information (FTI), is printed and compiled by CDSS and securely delivered to the counties, where the files are sorted and safely stored for their use. CDSS must manually provide this Recipient IEVS data, primarily due to the existing data-sharing agreement with the Internal Revenue Service (IRS), which does not permit FTI data to be shared with private vendors, such as the SAWS consortia, but can be

shared directly with the individual counties. Per their request, some counties receive the Recipient IEVS data via a paper summary, or abstract, that CDSS compiles and delivers when all the results from the different data sources have been reported.[55]

4.2.4 Other Data Sources and Systems

In addition to SAWS, Applicant IEVS, and Recipient IEVS, there are other systems that are present in the current technical environment.

- As discussed previously (see section 4.1.1), MEDS is used to determine if there is a prior record of the household having received benefits in the state. Information from MEDS can be used to satisfy certain verification requirements.
- The California Healthcare Eligibility, Enrollment, and Retention System (CalHEERS) supports eligibility determinations for Covered California and certain types of Medi-Cal. CalHEERS interfaces with SAWS and with the Federal Data Services Hub (FDSH), which provides states with access to verification data for purposes of the Affordable Care Act. Based on federal rules, data from the FDSH is not currently used for purposes of CalFresh and CalWORKs.
- County workers in some counties also have access to additional data sources that are available statewide but not adopted in all counties or only adopted on a limited basis. For example, some counties have adopted use of the California Immunization Registry (CAIR2) system, which provides information about immunizations.
- In addition to these statewide systems, counties may have access to local systems, such as local document-imaging systems.

Figure 5 provides an overview of the data sources that are available in the current technical environment. Figure 6 provides an overview of the systems present in the current technical environment, including SAWS, Applicant IEVS, Recipient IEVS, MEDS, CalHEERS, and local systems.

Figure 5. Data Sources in the Current Technical Environment

APPLICANT IEVS SOURCES – DHCS

SSA
40 Quarters Indicator
Title II, Title XVI, SSN

MEDS
Client Index Number (CIN), SSN, DOB, Citizenship/Immigration Status

USCIS
SAVE

FTB
FTB (Interest and Dividend)

EDD
DI
Online UI/DI (SB520) (Online Only)
UI
Wages

HHSDC
Intercept Overpayment Indicator
IEVS Applicant File (Online 60 Days Only)
Disqualification File Indicator
Homeless Indicator

RECIPIENT IEVS SOURCES – CDSS

ANNUALLY

IRS Asset Match
IRS Unearned Income File
(for out-of-state accounts)

Franchise Tax Board Asset Match
FTB Unearned Income File
(for in-state accounts)

SEMI–ANNUALLY

Deceased Person Match
SSA Death Master File

QUARTERLY

IFD Wage Match
EDD Wages

MONTHLY

Payment Verification System
SSA RSDI
EDD UI/DI
SSA BENDEX

Beneficiary Earning Exchange Record (BEER)
SSA Wages
IRS Unearned Income

Fleeing Felon Match
Dept. of Justice Wanted Person File

Nationwide Prisoner Match
SSA Prisoner Verification File

New Hire Registry Match
EDD New Hire Registry

Department of Juvenile Justice Match
DJJ Inmates/Wards File

OTHER SOURCES

WORK NUMBER
Earned Income

DMV
Address

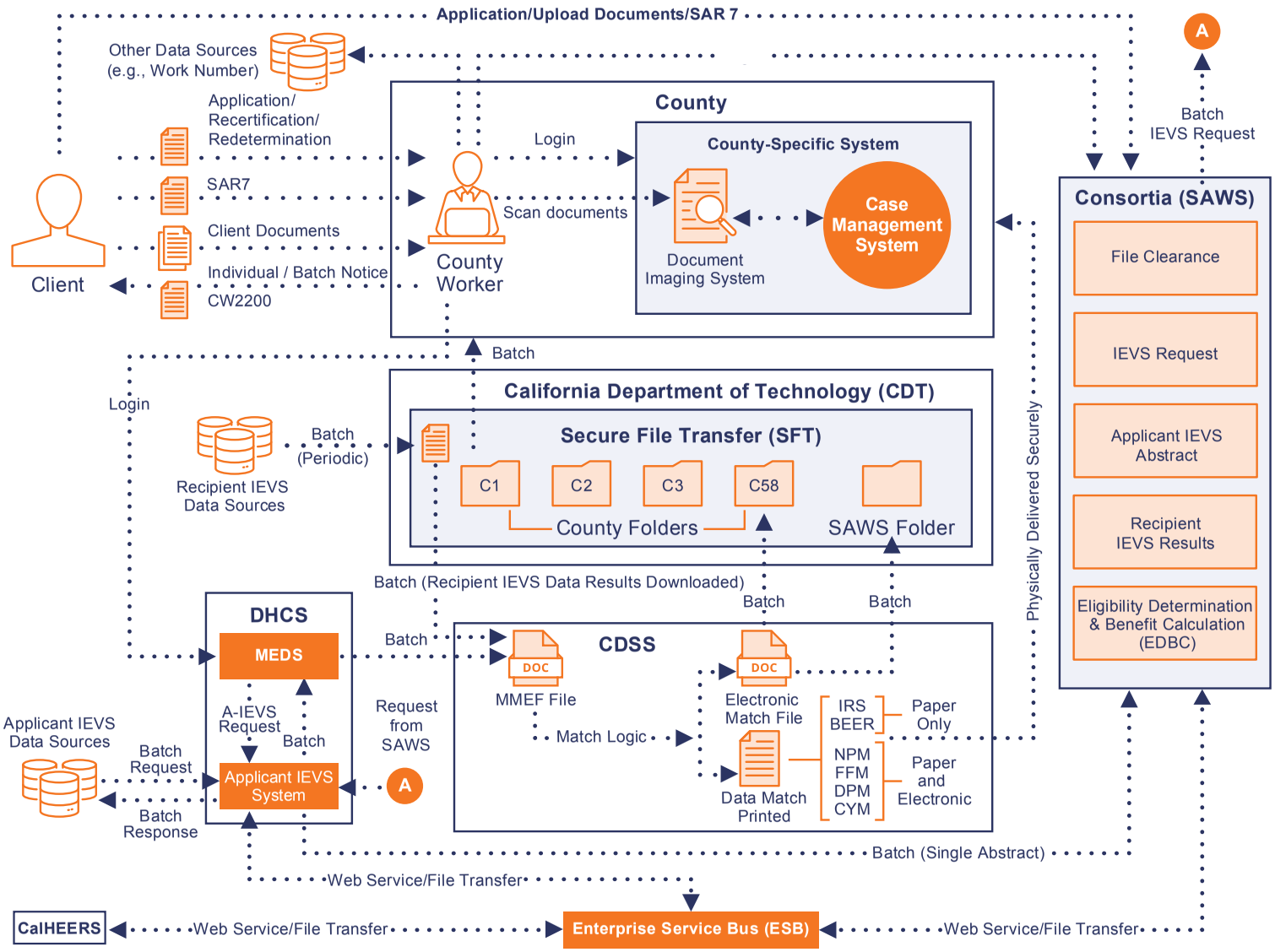
SAVE
Immigration

VITAL STATISTICS
Birth
Death

EDRS
Disqualification/Sanctions

CAIR2
Immunizations

Figure 6. Systems in the Current Technical Environment



5 Key Findings

Gaps in the current environment impede the goal of a verification process that is fast, accurate, and efficient for both clients and program staff. This section summarizes key findings about these gaps.

5.1 COMPLEXITY AND VARIABILITY

5.1.1 Different Verification and Reporting Requirements Across Programs

CalFresh and CalWORKs have similar requirements, but slight differences between the programs increase complexity for both clients and workers who have to navigate the differences. For example, though the IRT amounts for CalFresh and CalWORKs differ, most households that receive both CalFresh and CalWORKs are informed of only the CalWORKs IRT in their eligibility notice so that they have one IRT to use for reporting purposes. However, when county workers receive a mid-period report reflecting an income change, they are required to use the actual IRT for the respective program to determine whether to act on the information right away (e.g., for CalWORKs) and/or wait until the next periodic report or recertification/redetermination (e.g., for CalFresh). As a result, county workers may ask clients to provide different verification information at different times for the two programs.

CalFresh and CalWORKs recipients often receive other benefits, such as Medi-Cal, that are also administered by counties. Lack of alignment between these programs may present additional challenges for clients and county workers to navigate. For example, Medi-Cal rules for calculating and verifying income are significantly different than the rules for CalFresh and CalWORKs. In addition, county workers are currently only allowed to use verification data from the FDSH for purposes of Medi-Cal, not CalFresh or CalWORKs. As a result, clients are sometimes asked to provide the same or similar information to multiple programs, and county workers sometimes duplicate each other's efforts to verify the same or similar information.

5.1.2 Different Standards for Eligibility Versus Performance Monitoring and Improvement Activities

As previously noted (see section 4.1.4), it is important to both clients and administrators that eligibility determinations and calculations of benefit amounts are correct. Both CalFresh and CalWORKs engage in efforts to monitor and improve the quality of these decisions.

Under federal quality control (QC) requirements for SNAP, CDSS reviews a statewide sample of CalFresh cases using federally specified rules that require QC workers to review actual circumstances in the sample month.[56] This standard may lead to some differences between the information the county worker used to determine eligibility and the information the QC reviewer used to determine actual circumstances in the sample month. For example, in California, verification of shelter expenses for CalFresh eligibility purposes is a county option. However, federal QC rules require verification of shelter expenses, even in counties that have opted not to verify shelter expense. While eligibility workers have flexibility on what is acceptable verification, QC reviewers do not, which can sometimes lead eligibility workers to over-verify to avoid an error. Error rates from federal QC reviews can have a financial impact for both the state and counties.[57]

In addition to these federal requirements, CDSS performs CalFresh Management Evaluations to promote continuous improvement of program access, timeliness of processing, and payment accuracy.[58] CDSS evaluates each county, identifies corrective actions, and assists them in making the necessary improvements. Because most CalWORKs recipients also receive CalFresh, CalFresh performance monitoring and improvement activities may also impact CalWORKs cases. Some counties also engage in their own performance-monitoring and improvement activities, generally referred to as Quality Assurance (QA).

Performance reviewers generally use the information that was available to the county worker at the time of the original eligibility determination to assess the accuracy of the worker's determination. Yet the reviewer also has access to additional information. For example, electronic data sources will have been

updated since the time of the original eligibility determination. Stakeholders report that reviewers sometimes identify errors, including overissuances/overpayments of benefits, based on differences in data availability and the reviewer's own *de novo* eligibility assessment. In an effort to promote accuracy and avoid errors being identified during performance reviews, county workers sometimes request more documentation from clients or otherwise conduct more verification activities during an eligibility assessment than is required for purposes of eligibility verification. These unnecessary burdens and effort, known as over-verification, sometimes lead to avoidable delays or discontinuances of benefits if clients are unable to quickly obtain the requested documentation or unwilling to take the steps needed to obtain it.

Stakeholders identified the practice of "negative verifications," in which clients are asked to prove that something is no longer true, as an example of such over-verification. County workers sometimes see information in a client's prior case record or from an electronic data source that indicates a previous job, living situation, bank account, or other circumstance that the client has not currently reported. Although there is no eligibility verification policy requiring these activities, county workers may identify these pieces of information about the past as "questionable" and seek to resolve the potential discrepancy through negative verifications. County workers may utilize collateral contacts or self-affidavits in these situations. Alternatively, county workers sometimes require the client to obtain documentary evidence that they no longer receive income from a previous employer, are not currently renting or owning a property they had lived in in the past, no longer have a bank account that has been closed, or otherwise prove that something is no longer true or relevant. It can be challenging for clients to obtain such proof and may, in some cases, require the client to engage with third parties in ways that may be uncomfortable or even dangerous (e.g., contacting a former employer who sexually harassed the client).

5.1.3 Variation Among Counties

Clients and county workers experience verification differently across counties due to variations in policy and business practice. For example, some counties

have elected policy options that are at the county's discretion, such as requiring verification of shelter costs for CalFresh, while other counties have not. Some counties encourage clients to use self-service scanners available in the county office's lobby in order to upload documents, while other counties have clients leave paper documents with county clerks to scan them into the system. Some counties use county-specific data sources for verification, such as vital statistics or wage data for county In-Home Supportive Services (IHSS) workers, while other counties may have limited or no access to such data. Uniformity across counties may not be feasible or even desirable, due to differences in local needs and resources, but more consistent understanding and adoption of best practices could promote a better experience for clients and county workers.

Counties currently spend time and resources duplicating efforts to interpret and implement statewide policy changes and to train county workers on the new rules. For example, a policy change from CDSS likely requires updates to the three SAWS systems, workarounds to implement the policy until the systems are updated, and revisions to each county's handbook, training materials, and procedures. Thus, despite CDSS' efforts to streamline the verification process through policy changes issued through All County Letters or All County Information Notices, each county worker across the state will have received, understood, and implemented the policy change in different ways. Where there is confusion about the new rule, county workers will naturally default to the previous rules, which are familiar to them.

Stakeholders welcomed the possibility of a statewide policy and operations manual which would be updated when policies change, regulations that reflect the most current policies, and easy-to-use training materials and "cheat sheets" to help county workers – as well as clients – with the verification rules and process. For example, Code for America worked with counties to develop a form that listed the different student exemptions that county workers and clients could use to help them make determining student eligibility less complicated.

5.1.4 Greater Barriers for Specified Populations

Many of the previously noted challenges reflect examples of workers spending unnecessary time on verification activities and clients being asked to provide unnecessary or repetitive verification information. In particular, stakeholders provided examples of certain populations such as homeless individuals, college students, and individuals with limited English proficiency experiencing frequent challenges with the verification process. These challenges may stem from a number of factors, such as complicated eligibility rules, unusual household circumstances that county workers may identify as "questionable," and limited translations of verification instructions in languages other than English and Spanish.[59]

5.2 LACK OF TIMELY ELECTRONIC DATA

Data used for electronic verification comes from various sources, but not all data is useful or easily accessible for timely eligibility determinations. Below are key examples of how existing data from electronic sources creates a hindrance to delivering a verification process that is fast, accurate, and efficient for both clients and county workers.

5.2.1 Lack of the Most Current Data

The data provided by the electronic verification systems is often from a prior time period and cannot be used to determine and verify the current month's income. Although certain data – such as permanent verifications or unearned income – is relatively current, earned income data from Applicant IEVS is too old to be used to determine eligibility at initial certification/application.

5.2.2 Lack of Access to Other Data Sources

Electronic data sources currently being used by the state for CalFresh and CalWORKs eligibility verification can only provide data on a batch basis (vs. real time) or can only provide data prior to the current month. However, there are other

potential electronic data sources – such as State Online Query Internet (SOLQ-I) and the California Electronic Death Registration System (CA-EDRS) – that can provide data in real time (via an Application Programming Interface [API]), have more current data, and can also provide data in a variety of formats that other systems can quickly filter, process, and apply logical processing to before it is sent to the county worker.

Although new sources may be helpful, adding them may not be quick or easy given the current systems used for verification. The state's existing systems – such as MEDS, Applicant IEVS, and Recipient IEVS – are not easy to configure, and to modify them requires expertise in outdated COBOL programming language. As a result, incorporating real-time web services and web APIs may not be possible at the state level in the current environment. Even where new interfaces to other data sources could be established, security layers/firewalls of relevant systems would have to be assessed before utilizing real-time web APIs. In addition, policies and data-sharing agreements have to be established between the state and other sources of data. For example, for those counties with access to additional data sources, each have their own data-sharing agreements and had to build separate interfaces.

Contributing to these challenges is the governance and architecture of California's eligibility and verification systems. Although certain external sources can be accessed directly by some counties through a separate manual login, the data cannot flow easily from the external sources to the counties via the existing SAWS. As a result, it is a challenge to obtain data from external sources so that all counties have the same access to the relevant data sources.

5.2.3 Limited Transparency

Data from external sources is received, processed, and transmitted to counties by different state agencies, but there is limited information regarding these arrangements. This can lead to inconsistencies and gaps in how information is processed within each of the systems. For example, each agency's data processing may differ regarding how the match is performed, the logic used,

the technology used, analytics, tolerance levels, and relevancy of data. Even in determining if there are potential inconsistencies in the data processing, it requires each agency to understand their own and others' criteria, which is currently not done in any formal way.

5.3 BURDENSOME MANUAL PROCESSES

The current environment for CalFresh and CalWORKs verifications is inherently inefficient and slow, imposing a barrier to expedited processing. Below are specific areas detailing where the current process is time-consuming and creates delays for county workers and clients.

Examples of electronic data delays include the following:

5.3.1 Inability to Access Data Sources in Real Time

The majority of electronic data used for eligibility verification is not available to county workers in real time or even within the same day. Real-time access for purposes of eligibility determinations for CalFresh and CalWORKs refers to the ability to request data from an external source at any time, such as Work Number or Systematic Alien Verification for Entitlements Program (SAVE), and immediately receive electronic results.

Examples of electronic data delays include the following:

- From the beginning to the end of the Applicant IEVS process there are delays that prevent the data results from being used efficiently in the verification process. First, the initial request to run Applicant IEVS is sent from each county in a nightly batch to MEDS, causing an immediate one-day delay. Second, Applicant IEVS is only able to request and receive results (at different times) for the 14 required data matches in batch. The soonest the data is available is 24 to 48 hours after the request was sent, but only if viewed directly in MEDS. The longest delay occurs between the time Applicant IEVS receives the results and then waits for all the data sources to arrive to compile and create a summary,

known as the Applicant IEVS abstract, which is sent to SAWS 5 to 7 days after it has been requested. The final delay occurs when the abstract is reviewed by a county worker in SAWS who manually enters the relevant data (rather than have it auto-populate).[60]

- In general, data sharing between MEDS and SAWS happens through a daily batch process. Although data to verify SSN, DOB, and state residency may be viewable in MEDS in real time, any changes or updates in SAWS are not immediately reflected in MEDS.

Many data elements currently provided in batch through Applicant IEVS could be provided in real-time through the SOLQ-I system, which is not currently used by CalFresh or CalWORKs. However, as discussed below (see section 6.1.2.2), adding a new data source such as SOLQ-I presents technical challenges as well as policy and governance issues based on SSA requirements.[61]

5.3.2 Inefficient Electronic Data Processing

County workers spend an inordinate amount of time manually processing electronic and non-electronic data that could be pre-processed by a system to make the data more readily useful to the worker. Below are specific instances where the receipt of data creates additional work for the county workers and increases the likelihood of requiring more verification from clients:

5.3.2.1 Unfiltered Data

In the current environment, data results from verification sources are not sufficiently filtered to ensure that only relevant data is sent to the worker. Although there is some filtering of the data, more could be done at the state and county level to use systems to determine what data is relevant enough for a worker to investigate, rather than having them spend time making that determination.

For example, Recipient IEVS matches data files from external sources against the MMEF file. The MMEF file contains sufficient client information

to generate a match, and all matches are sent to the counties. That data requires further filtering by each county before it is sent to SAWS for workers to be able to review and take action if necessary. However, it appears that no other filtering is done by the systems to help determine whether the data received is actually relevant to an individual's ongoing eligibility (e.g., if it is sufficiently current, if it is different from a prior result, etc.). Instead, county workers must review all data received and make that determination manually, increasing the likelihood of errors such as an incorrect application of the rules. More precise filtering will not only help reduce inefficiencies and inaccuracies to process pushed data, but it can also help ensure that only the minimally necessary information to determine ongoing eligibility is being shared with county workers, as is required by existing privacy and confidentiality protections.

5.3.2.2 Unprocessed Data

Based on federal and state requirements, data from Recipient IEVS is automatically pushed out to SAWS at regular intervals, regardless of the timing of the periodic report or annual recertification/redetermination of any particular case.[62] For continuing cases, county workers spend time evaluating data that is pushed to them to determine if the data is relevant to eligibility, if action is required under federal or state rules, or if it raises inconsistencies that require additional paper documentation.[63] County workers expressed frustration that data they receive between reporting periods is not relevant. They would prefer that data be sent at the required reporting periods for each case rather than at the intervals the data is currently sent from the external sources, or that some Recipient IEVS results could be suppressed or ignored as "too old" or "unclear" information.[64]

In addition, the timeliness of data received decreases with the current manual processing of data. For example, because of data-sharing restrictions, IRS data that is already one to two years old can take an additional 18 weeks of processing and transfer time, including six weeks for CDSS to collate and distribute the data in paper form to the counties – plus another six weeks

for the counties to process the documents before county workers can use it. Given how dated it is by the time a county worker is able to review it, the IRS data can only be used to determine if a client who was receiving benefits more than two years ago may have underreported his/her income. Some counties reported that their internal analysis demonstrated that the amount of overissuances/overpayments found by a review of the IRS data was minimal and likely did not cover the administrative costs of processing the data.

5.3.2.3 Duplicate Data

Without better filtering and processing of data from external sources, county workers receive and must review duplicate data that stems from different pieces of information from different sources, or from the same source but generated at different times, about the same eligibility factor. Sometimes the duplicate data can lead to apparent inconsistencies, such as conflicting dates of birth. To resolve the discrepancy, especially if the duplicate data is from a source that is considered VUR for CalFresh, workers will need to request additional documentation from the client. Eliminating and resolving duplicate data issues before the data reaches the county worker would likely lead to fewer burdens on both county workers and clients, as well as reduced administrative costs.

5.3.3 Multiple Logins

There are multiple computer systems and applications that county workers have to log into in order to perform their work. At a minimum, many county workers must log into SAWS, MEDS, SAVE, and at least one to two county-specific systems (e.g., for task management and/or document management).[65] Although county workers primarily rely on SAWS for case information and eligibility determination, there is no easy way to access data from other systems like MEDS directly from SAWS. Instead, they must log into the MEDS web-based service outside of SAWS to conduct file clearance, verify certain eligibility criteria such as SSN or DOB, and confirm whether an individual's benefits are active once they are found eligible in SAWS. Although an Applicant IEVS request may be made within SAWS,

the request is sent to MEDS and the results are not immediately available to the county worker. The only way county workers can expedite the Applicant IEVS process is to log into MEDS to send the Applicant IEVS request, and to log into MEDS within 24 to 48 hours to view the results of the Applicant IEVS match within MEDS. The county worker must then manually input relevant data from MEDS to SAWS, requiring the worker to work simultaneously in both systems for simple data entry.

County workers must also log into the same system multiple times during the day because, for security reasons, access to systems like MEDS “times out” after a certain period of time. At any given time, county workers may need to login and work within five or six different systems to verify eligibility criteria.

5.3.4 Lack of Automation

When workers obtain verification data from systems that do not directly interface with SAWS, they must manually enter the data into SAWS. At best, county workers may be able to copy and paste specific data from one system to another. Without better interfaces between systems, there is no auto-population of data or automated way to transfer data from one system to another. This leads to additional processing times and increases the likelihood of errors.

In addition, despite having access to multiple systems, county workers must often process necessary calculations manually because the systems either do not have the logic built in or there are no easy-to-use tools within the system. For example, the income from multiple paycheck stubs from different employers within the same pay period must be manually calculated by the worker rather than have the system auto-populate the key data from the different paycheck images to determine the individual’s monthly income. In the current environment, systems do not automatically compare new income information with the clients’ existing IRT and do not notify the worker whether further action is immediately required, or if action should be delayed until the next recertification/redetermination.

If the systems could help the workers better transfer data from one system to

another, or apply logic to determine if new data is relevant at that time, verification would be quicker and more accurate and workers could spend more time on verification of eligibility criteria that may be more complicated and require their attention.

5.4 BURDENSOME PAPER DOCUMENTATION PROCESSES

5.4.1 Document Imaging Delays

Individuals can upload their documents through a web-based consumer portal that directly interfaces with the county's document-imaging and SAWS systems. However, uploaded documents are often not immediately viewable to the county worker who is processing the application. Even if documents are quickly processed and sent to SAWS, the system may not notify the county worker until the next day that there are documents available for their review. To help expedite the process, county workers may request that individuals call them (or the call center) after they have uploaded documents via the consumer portal.

Individuals may bring their documents directly to the county office, with the hope of expediting the processing time. However, there are similar imaging delays for documents submitted in person. For example, if the document is left in a drop box at the county office or hand-delivered to a clerk, it must be scanned and sent to SAWS before a county worker can act on it. Even if a county worker can review the actual document in-person during an interview, the county worker must then scan the document and wait for it to appear in SAWS before taking further action on the application. There may be an over-emphasis on ensuring all verifications are properly documented within the system over the ability to expedite the application processing based on the information they are able to physically review.

In addition, much manual time and effort is required by county workers to ensure the documents scanned are readable and indexed correctly before they are uploaded to SAWS. Documents scanned, or pictures uploaded by the individual, are often difficult to read, and thus each document must be manually reviewed for

legibility. The problems with document resolution may be due to compression or reformatting, which can cause deterioration and lead to user error.

5.4.2 Document Management Delays

Proper paper-document management is crucial for timely processing. Unless scanned documents can be appropriately organized, labeled, and filed in a way that enables the county worker to easily find the relevant documents for purposes of verifying eligibility, the application processing will be delayed – despite the county worker's best efforts. Currently, each of the three consumer portals used by the counties can be challenging for clients to navigate successfully. As a result, uploaded documents may be improperly indexed, which leads to improper routing and processing delays. In addition, customers may scan and upload multiple documents as a single file, which cannot be electronically reorganized or indexed. The workaround is to manually print out the single file of documents and rescan and index each image separately.

Without proper indexing, a county worker must open and view every available document that has been uploaded just to determine what information was provided by the client. Only after the correct document has been found can the worker review the actual content of the document to assess whether the document satisfies verification requirements.

5.4.3 No Centralized Document Repository

There is no centralized document repository in the current environment. Documents that have been uploaded and are stored in SAWS or a county's document-management system are not easily accessible to another county – even in read-only mode or if both counties use the same SAWS system. This prevents reuse of documents provided by families across counties or different programs within the same county.

This gap has a significant impact when clients move from one county to another within the state but otherwise remain eligible for continued benefits. Because

CalFresh and CalWORKs are statewide programs, state law provides that clients who move to another California county and otherwise remain eligible should not experience an interruption in benefits due to an address change. To the extent possible, a client's case should seamlessly be transferred from the original county (the sending county) to the new county of residence (the receiving county) through an ICT process that ensures the client does not need to provide copies of documents that were previously provided to the prior county of residence.[66]

In practice, county workers report that they sometimes do not receive the case or all the required documentation from the sending county in a timely manner. In addition, when documentation is sent, the resolution of document images sometimes degrades during the transfer and documents may therefore not be legible by the receiving county. As a result of such limitations, in order to complete the receiving county's documentation of the case and ensure all verification requirements are satisfied, county workers in receiving counties sometimes request clients submit information they may have already provided to the sending county. Thus, the inability to easily share and transfer case documentation sometimes leads to repetitive and burdensome processes for both clients and program staff during an ICT.

5.4.4 Under-utilization of Document Management Tools and Techniques

Document-management applications and tools in the current environment do not support a more efficient, effective, or easier process for all users. Tools such as Optical Character Recognition (OCR) and Intelligent Document Recognition (IDR) can be used to make images easier to scan, and to automate the transfer of data from a document to the system in order to avoid manual data entry. Tools to streamline the identification of document types and indexing capabilities can help reduce the submission of documents with repetitive information or redundant information and allow quicker processing of paper verifications. Such options are not available in the current environment.

6 Recommendations

6.1 OVERVIEW: RECOMMENDED FUTURE ENVIRONMENT

As described above, the current environment that supports the verification process for CalFresh and CalWORKs is a tangled web of data sources, systems, and access points that have significant variability throughout the state, making the process overly complicated and resulting in significant challenges for clients and program staff. Based on our analysis, including consideration of extensive stakeholder input, we recommend California develop a verification environment that supports fast, accurate, and efficient verification processes for clients and program staff of CalFresh and CalWORKs. We also recommend this environment be designed and leveraged to benefit other health and social services programs in California that have similar verification needs and serve similar populations, such as Medi-Cal and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

6.1.1 Objectives

We identified the following key objectives for the future environment:

- **For clients:**
  - Clarity about verification requirements and how to comply with them;
  - Transparency regarding the status of their verifications and the basis for verification results;
  - Reduced need for paper documentation, including repetitive requests for documents that have already been provided and remain valid; and
  - Multiple means of easily submitting verification documents when they are needed, including online submission, submission via mobile devices, and self-service scanning options in county offices and community locations.
- **For program staff:**
  - Clarity about verification requirements and how to exercise their discretion in satisfying them quickly, accurately, and efficiently given the

client's circumstances;

- Access to only the electronic information that is relevant to a client's eligibility and only at the time it is needed for expedient processing;
- Sufficient transparency regarding verification results from electronic data matches to resolve potential verification discrepancies; and
- Efficient access to and processing of documents provided by clients.

Achieving these objectives will require a clear vision and coordinated technical and non-technical changes, including changes in governance, policy, and operations. We recommend CDSS work with partners and stakeholders, including other state agencies, counties, and consumer advocates, to achieve a coordinated set of improvements. Our technical recommendations include enhancements to existing systems that would streamline the verification experience for clients and program staff, offer better access to available data sources, and create a new centralized and secure means of facilitating appropriate data sharing efficiently for CalFresh and CalWORKs that can also be leveraged across other health and social services programs in California. Our non-technical recommendations include the creation of a statewide, client-centered vision for CalFresh and CalWORKs eligibility, which would promote cross-program alignment and guide decision-making toward a desired future environment that supports fast, accurate, and efficient verifications.

6.1.2 Technical Recommendations

We recommend a future technical environment that enhances key systems in the current environment, such as SAWS, while expanding access to valuable data sources and facilitating appropriate data flows through the addition of a new state verification hub. These recommendations are intended to provide a complementary set of technical options for CDSS to consider with its partners and stakeholders, including other state agencies, counties, and consumer advocates, for implementation over time.

6.1.2.1 Enhancements to Existing Systems

We recommend a future technical environment that enhances key systems

in the current environment, particularly to address burdensome, inefficient paper document processes. As SAWS continues to evolve, we recommend CDSS undertake a user-centered design initiative to streamline the online verification experience for clients and program staff. For example, efforts may include tools that make it easier for clients, including specified populations that face particular verification challenges, to understand what verifications are needed, upload appropriate documents correctly, and get updates on verification status. We also recommend that CDSS work with counties to promote a centralized document repository coupled with advanced document imaging and management capabilities to reduce repetitive and burdensome paper document processes for both clients and program staff.

6.1.2.2 Better Access to Available Electronic Data Sources

While it is important to streamline the processes for cases when paper documents are necessary or preferred by clients, it is vital that the future environment expand access to valuable electronic data sources, particularly those that provide more current data on a real-time basis when requested. Doing so will minimize the need for manual processes associated with obtaining paper verification documents and save clients and workers significant time and effort.

We have identified several electronic data sources that are either not currently used for purposes of CalFresh and CalWORKs or that are not consistently used across counties. Expanding access to these sources would help promote timely electronic data and reduce the need for paper documentation from clients. Additional data sources should be evaluated for adoption over time.

- **Work Number:** The Equifax/TALX Work Number service provides access to recent earned income data in real time. This service is generally considered the most current available source of earned income verification, but it does have limitations. First, not all employers participate in the service, so earned income data is not available for

clients who work for non-participating employers. Second, there are sometimes challenges with data matches. For example, a client may report the common name of their employer, but the employer may use a different name in the Work Number service, such as the name of its parent corporation. The differing employer names may lead to a false-negative result. Despite these limitations, counties and other states that currently use the Work Number service have found it helpful in confirming earned income and avoiding the need for paper documentation in many cases, including at initial certification/application. Therefore, expanding access to and the utilization of the Work Number service could address multiple gaps in the current environment.

- **SOLQ-I:** SOLQ-I is an SSA application that offers authorized state agencies real-time online access to data that can be used to verify SSN, citizenship, disability income, Title 2 and/or Title 16 benefits, residency, and out-of-state benefits. SSA requires each state to designate a single state agency to act as the sole point of access to SOLQ-I data for the state. Currently, the only state agency with SOLQ-I access in California is DHCS. Under current SSA data-sharing agreements, DHCS does not provide county workers with access to SOLQ-I data. We recommend CDSS work with DHCS to explore changes to the current SSA data-sharing agreement and associated technology changes that would enable access to SOLQ-I data for CalFresh and CalWORKs purposes.
- **FDSH:** As previously noted (see section 4.2.4), the FDSH is currently available to California for purposes of the Affordable Care Act but cannot be used for CalFresh and CalWORKs verifications. Recently, SSA began granting states permission to verify seven data elements through the federal hub for purposes of TANF and SNAP as well as Medicaid.[67] Approval to use the federal hub to verify some eligibility factors for CalFresh and CalWORKs is currently pending.
- **CAIR2:** CalWORKs requires verification of immunizations. Immunization records are electronically available statewide through the CAIR2 web service, but each county must work with the California Department of

Public Health (CDPH) to establish access for eligibility workers in the county. Counties have made different choices about whether to utilize CAIR2 and how to incorporate it into their operations. We recommend CDSS work with counties and CDPH to standardize access to and use of CAIR2 statewide.

In addition to expanding access to high-value data sources, we recommend that CDSS reduce the flow of older, less relevant data that causes unnecessary effort for clients and program staff. In particular, we recommend that CDSS explore the use of filtering techniques to limit "pushes" of Recipient IEVS data to county workers in order to prioritize their investigation of results that may require mid-period action and avoid the unnecessary investigation of low-priority results. We also recommend CDSS explore more cost-effective ways to meet the federal requirement to review IRS data than the current manual process of securely transporting and storing hard copies of sensitive FTI (see section 4.2.3). For example, we recommend CDSS explore use of the FDSH or tools that allow the IRS data to be more efficiently filtered and processed at the state level.

6.1.2.3 A Centralized State Verification Hub

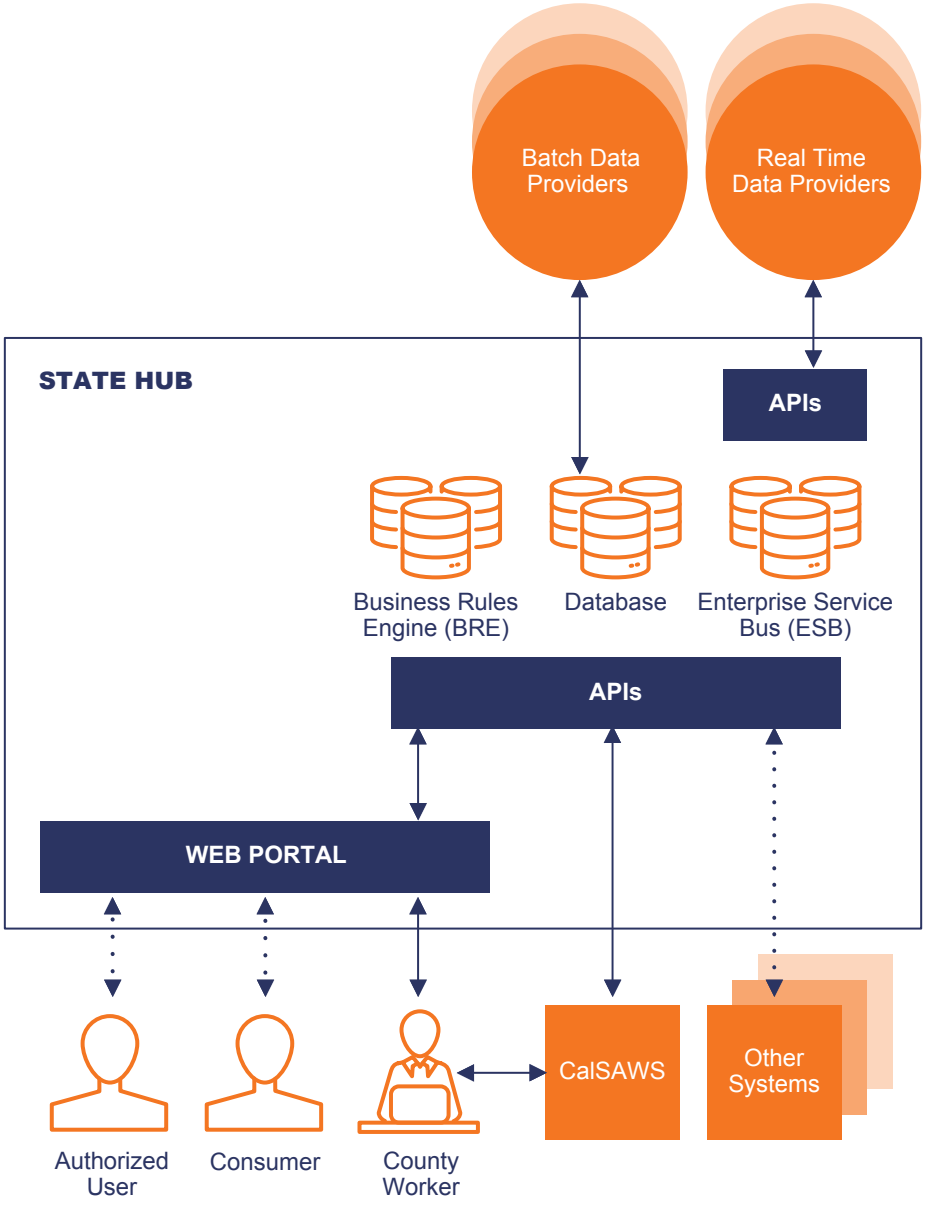
We recommend that the future environment include a new state verification hub that centralizes and facilitates appropriate access to electronic verification data for authorized users. We recommend that all current means of access to electronic verification data for CalFresh and CalWORKs be evaluated and considered for migration into the new state hub environment over time. We also recommend that additional electronic verification data sources that are not available today be added to the new state hub environment over time. While the initial focus of this hub should be to support CalFresh and CalWORKs, it should be designed and developed with the intent of supporting additional health and social services programs that serve similar populations and have similar verification needs. This new state hub should include at least the following capabilities:

- **Data exchange** in real time and in batch, and on a “pull” or “push” basis, as appropriate to the data source and verification requirements. This data exchange would be facilitated by using an Enterprise Service Bus (ESB), or similar construct, to drive the state hub;
- **Access controls** to ensure that data is accessible only to authorized users as appropriate to their role, following proper security, confidentiality, and privacy standards;
- **Logging** to support audit trails of who accesses what data at what times, which is required to meet federal security requirements;
- **Data caching** when batch data matches are required, so that match results are appropriately stored until needed for verification processes. This caching and/or tables in memory would require the state hub to include a database component;
- **Automated data filtering** to help authorized users focus on higher-priority results and reduce the flow of old, irrelevant, or otherwise lower-priority results. This filtering would be facilitated by including a Business Rules Engine as a component of the state hub;
- **Interface** capabilities to support integration with other systems, such as SAWS. The state hub will need to include APIs;
- **Web portal** access for authorized users to have direct access to the state hub when appropriate; and
- **Analytics** capabilities to monitor hub performance and measure impact.

Figure 7 below illustrates the recommended state hub. In this hybrid model, the hub would offer both real-time and batch capabilities for both data providers (sources of data) and data users (systems or individual authorized users with the ability to make queries and receive results). Note that a single entity could potentially be both a data provider and a data user. Authorized data users could access the hub directly by signing onto a web portal and/or indirectly by signing onto a system that has been integrated with the state hub (e.g., CalSAWS). The ESB provides flexibility to manage adding, deleting, or

changing data providers and data users over time.

Figure 7. State Verification Hub



6.1.3 Non-Technical Recommendations

Along with the technical recommendations, we have identified strategies that could help to address gaps in the current environment regardless of the specific technical solutions adopted by CalFresh and CalWORKs. These non-technical changes could be undertaken prior to and in conjunction with associated technical changes. The recommendations center on a statewide vision that is reinforced through governance, policy, and operations:

- **A statewide vision** that defines and guides decision-making toward a desired client-centered future environment that supports both CalFresh and CalWORKs verifications.
- **Governance** structures that formalize coordination on matters of shared importance and value across agencies, departments, programs, systems, and stakeholders, including shared mission and vision, shared technology infrastructure, data-sharing agreements and access controls, and change management to ensure continued interoperability over time.
- **Policy** changes and clarifications to address at least the following matters:
    - Promote policy alignment across programs and between eligibility and performance-monitoring and -improvement functions;
    - Promote the use of the best available data, particularly regarding earned income, and restrict the use of historical data that is too old to be relevant for eligibility purposes;
    - Promote statewide standards for data access, including role-based access, access on a “pull” versus “push” basis, and automated filtering and processing of data to minimize the necessary flow of information;
    - Promote the re-use of data that is already available in order to reduce the need for repetitive verification effort for clients and program staff; and
    - Reduce barriers faced by certain eligible client populations, including clients who are college students, non-citizens, and/or homeless.
- **Operational** improvements that give county workers tools to understand and navigate verification requirements, provide ongoing training for county workers

regarding current verification policies and as verification policies and systems change, and that promote evidence-based decision-making through testing and performance monitoring.

This combination of technical and non-technical solutions will create an environment in which verification processes can stay current as requirements change (e.g., as federal and state policies change, better verification data sources become available, and technology innovations emerge) and improve over time based on feedback from users and other performance measures.

A phased approach will be required to achieve the desired future environment over time. We recommend the following stages, described in more detail in the remainder of the Roadmap:

- **Stage 1 – Lay the Foundation (Near-Term Recommendations, Years 0-2):** Build a proof of concept for the new state hub that allows testing of new governance structures, technical infrastructure, coordinated data-sharing agreements and access controls, and automated rules. In parallel, develop and implement appropriate policy and operational changes, prioritizing: 1) a statewide vision for CalFresh and CalWORKs eligibility, to guide other decision-making; 2) policy changes and clarifications that can be implemented in the current environment; and 3) policy changes and clarifications that constitute requirements for the new state hub. Use these parallel efforts to inform each other and to inform planning for the new state hub and other changes to the technical environment. As SAWS migration continues: 1) undertake a user-centered design initiative to streamline the SAWS portal verification experience for clients and program staff; and 2) expand and enhance centralized document-imaging and -management tools that facilitate the processing of paper documents and reduce the need for clients to provide the same or similar documents on multiple occasions.
- **Stage 2 – Learn, Plan, and Implement Direct Access (Medium-Term Recommendations, Years 3-5):** Design and implement the Direct Access approach to the state hub. Pilot access for county workers and other authorized users (e.g., authorized staff of programs such as WIC and

consumers) before launching statewide. Gradually migrate existing data matches, such as those currently performed via Applicant IEVS and Recipient IEVS, onto the state hub. Continue to implement policy and operational changes. Monitor performance throughout the pilot stage.

- **Stage 3 – Integrate with CalSAWS (Long-Term Recommendations, Years 6-10):** Design and implement integration of the state hub with CalSAWS. This timeline allows CalSAWS migration to be completed before integration with the state hub while allowing county workers to gain many of the advantages of the state hub in the interim period through the Direct Access approach. Direct Access for county workers can be maintained after CalSAWS integration in order to provide workers with flexibility (e.g., continued access to state hub in the event CalSAWS is temporarily unavailable).

6.2 NEAR TERM RECOMMENDATIONS (YEARS 0-2)

6.2.1 Build a State Hub Proof of Concept

Given findings about the widespread diversity and inconsistency across agencies in their governance structures, technical infrastructures, data-sharing agreements and other rules, and the need to solve these issues and build a coordinated approach as quickly as possible, building a proof of concept is the logical place to start. CDSS should immediately begin working with the CHHS Agency Information Office, Office of Systems Integration, key partners at other agencies, and other stakeholders to test a governance model charged with building a proof of concept for the new state hub within one year. The governance model can continue to be refined as the proof of concept build progresses. We believe that it is imperative that policy staff from CalFresh, CalWORKs, and other programs participating in the governance model remain closely engaged in the proof of concept build in order to ensure a coordinated feedback loop between technical and non-technical efforts.

To accomplish the effort in one year, the scope of the proof of concept will need to be clearly defined and well managed. We recommend the following priorities for the proof of concept:

- Begin with a relatively small number of data exchanges that are of high value in addressing current gaps. Doing so would speed the delivery of valuable verification data, make it available more uniformly across counties, and demonstrate the concept of a consolidated view of data that currently must be accessed via separate log on. For example, we suggest building into the proof of concept:
    - Work Number, for real-time access to reasonably current earned income data;
    - SOLQ-I, for real-time access to SSN, citizenship, disability income, Title 2 and/or Title 16 benefits, residency, and out-of-state benefits data;
    - SAVE, for real-time access to immigration status data, either through a direct connection to SAVE and/or via the FDSH; and
    - CAIR2, for real-time access to immunization data.
- Demonstrate the concept of integrating a centralized data repository to enable reuse of previously submitted documents, including reuse across counties and programs.
- Include APIs to test some of the basic protocols for “pull”/“push” data with both web portal access and integrated system access.
- Incorporate limited automated rules to test basic filtering.
- Model appropriate access controls and security standards, such as the Minimum Acceptable Risk Standards for Exchanges (MARS-E) standard.[68]
- Include basic analytics to measure performance and impact so that the proof of concept yields key learnings to inform future decision-making.

6.2.2 Lay the Foundation for Future Changes

As the proof of concept build progresses, we recommend that CDSS work with other stakeholders to lay the foundation for future changes in the environment that supports CalFresh, CalWORKs, and other health and social services programs in California.

6.2.2.1 Statewide Vision

We recommend CDSS explicitly articulate a statewide, client-centered vision for CalFresh and CalWORKs eligibility, which can then be used to drive decision-making and be reinforced through governance, policy, operations, and technology. DHCS and Covered California's efforts to establish a culture of coverage when implementing the Affordable Care Act can serve as a model.

6.2.2.2 Governance

Building on lessons learned from developing the proof of concept, CDSS should work with partners and stakeholders to establish formal governance structures to ensure coordination on matters of shared importance and value across agencies, departments, programs, systems, and stakeholders. Matters of shared importance include developing a shared mission and vision, shared technology infrastructure, data-sharing agreements and access controls, and change management to ensure continued interoperability over time. Governance should reflect a commitment to transparency and the importance of engaging all stakeholders, including those who advocate on behalf of CalFresh and CalWORKs clients, to inform decision-making.

6.2.2.3 State Hub Priorities

Based on the statewide vision for CalFresh and CalWORKs eligibility and informed by the proof of concept, CDSS should work with other partners and stakeholders to identify technical and non-technical priorities for the new state hub. We recommend the following priorities:

- **State programs that will use the new hub.** At minimum, design the new state hub to support CalFresh, CalWORKs, and Medi-Cal. Identify at least one additional program that has a significant overlapping client population with CalFresh and CalWORKs and similar verification needs, but that is administered by an agency other than CDSS or DHCS, to also be supported in the design. WIC may be a good candidate.

- **Data sources.** Adopt a phased approach to data integration, prioritizing inclusion of data sources that speed the delivery of valuable verification data, make it available more uniformly across counties, and reduce the need for separate log on, relative to the current environment. Review and revise data-sharing agreements accordingly. Prioritize Work Number, SOLQ-I, and CAIR2. Add or migrate additional data sources, such as those currently accessed via Applicant IEVS and Recipient IEVS, over time. Consider inclusion of data sources available from the FDSH via CalHEERS, notably the Verify Current Income (VCI), SAVE, SSN verification, and SSA benefits verification services. Note that leveraging the FDSH would require both policy change and decisions about how to integrate CalHEERS with the new state hub.
- **Authorized users and access controls.** Initially, consider county workers and program administrators as the highest priority users for the new state hub, but design and create an infrastructure that also enables future access by consumers. Access controls that ensure proper authentication, authorization, and accountability are essential.
- **Security.** At minimum, adopt the MARS-E Version 2.0 standards as the security framework for the hub.
- **Design consideration.** Employ best practices in user-centered design through all stages of the state hub plan. This is explained in greater detail below.
- **Automated rules.** Undertake a comprehensive review of data sources to be included in the new state hub and determine for each whether the source will be accessible on a “pull” and/or “push” basis, and how the data can be filtered and otherwise auto-adjudicated to promote fast, accurate, and efficient verifications.
- **Data reuse.** Ensure the new state hub facilitates reuse of data and findings across counties and programs to satisfy verification requirements. For example, the new state hub could interface with the centralized document repository (see below) to promote reuse of

documents previously provided by a client.

- **Analytics.** Include strong analytics capabilities to enable monitoring of performance against desired outcomes.

With priorities established, CDSS and other stakeholders should determine the appropriate procurement plan (build, buy, or rent) and long-term operations model for the state hub. We recommend that the procurement plan be put into place by the end of Year 2 (e.g., if the decision is to buy, release an RFP and secure a contract by the end of Year 2).

6.2.2.4 Alignment With Other Technology Initiatives

The new state hub should be a free-standing system that is not tied to any existing technology initiative but that is developed within an appropriate framework to allow integration with other systems, with formal governance structures to ensure coordination of shared assets and continued interoperability over time. This will require the hub to utilize technical approaches that allow for rapid adoption as well as modification to support the dynamic technical environments with which it will need to exchange data. Specifically, we recommend that the state hub interface with SAWS and MEDS as those systems evolve, but that development and operation of the state hub not be dependent on SAWS migration or MEDS modernization. This will require clear decision-making and coordination across agencies and programs.

One clear need for coordination is in document imaging and management. We recommend creating a centralized, statewide document repository coupled with advanced OCR/IDR tools to facilitate document imaging, management, and distribution or alerting, including streamlined access to documents a client previously provided to another program or county. These improvements could be provided on a statewide basis through CalSAWS or otherwise. State hub planning will need to be consistent with whichever path is chosen. For example, the new state hub could interface with the centralized document repository to promote reuse of documents previously provided by a client.

There is a similar need for coordination with a statewide SAWS consumer portal. As planning for the SAWS consumer portal proceeds, planning for the new state hub will need to address whether and how to interface with the SAWS consumer portal and/or provide direct access for consumers to the state hub in order to provide clients with transparency regarding the status of their verifications and the basis for verification results.

To inform state hub, document imaging/management, and consumer portal decisions, we recommend CDSS, working with other stakeholders, engage in at least some user-centered design initiatives in conjunction with the proof of concept to address the multiple challenges clients face when submitting paper documents. We recommend the state explore options such as the following:

- Streamline the client experience of uploading documents electronically. For example, implement design improvements to make it easier for people to navigate and complete document uploads. Also, ensure accessibility for people with disabilities in accordance with Americans with Disabilities Act requirements;
- Expand self-scanning opportunities in county offices and at other sites in the community, such as libraries and schools;
- Provide clients with clearer instructions regarding what verifications are needed, what documents can be used to satisfy the requirements, ways to submit documents, how to categorize documents for proper routing, the status of verifications, etc. Improvements are needed both for hard copy and online notices;
- Ensure better language access by providing information in all threshold languages (regardless of communication channel) and expanding language support.

Similarly, we recommend CDSS, working with stakeholders, engage in a user-centered design initiative regarding tools for program staff. Some of the same tools that would help clients understand verification requirements and

processes could also be useful to program staff. Examples include:

- **Compendium of policy guidance.** CDSS provides policy guidance to counties through a variety of mechanisms, relying heavily on All County Letters. While all guidance is centrally posted on the CDSS website in chronological order and searchable, the letters frequently cross-reference other materials, making it difficult for workers (and other stakeholders) to be certain that they have a complete and current policy view. Counties have their own program manuals that attempt to capture all state and local guidance in a more digestible form, but this involves a lot of duplicative effort across counties and creates opportunities for unintended variation. In addition to promulgating updated, aligned program rules (see below), we recommend CDSS explore opportunities to maintain a regular, reliable, and clear compendium of state policy guidance that reflects program regulations as they are updated and that serves as a reference aid for county workers (and other stakeholders). Similar policy references are available in other states, such as Washington and New York.[69]
- **Verification reference tools.** A variety of reference tools could help county workers understand what verifications are needed and what forms of proof are acceptable, particularly in complex or unusual client circumstances. For example, useful tools might include checklists of acceptable forms of verification for each eligibility factor, sample images of acceptable documents, and a catalog of use cases to illustrate how to handle complex cases. Such reference tools could be made available via a centralized web repository and/or through SAWS.
- **Integrated workflow tools**. A user-centered design initiative might help to identify opportunities to integrate additional verification workflow tools into SAWS to facilitate efficient verification processing. For example, workflow tools could help workers processing a new CalWORKs application for a client who is already receiving CalFresh or Medi-Cal understand what marginal additional verifications are required versus verifications that have already been completed via CalFresh or Medi-Cal

and therefore do not need to be repeated.

6.2.2.5 Policy Alignment

Policy changes and clarifications can help to enhance the value of electronic data in the verification process, guide the adoption and use of a technical environment that supports the verification process, and standardize verification processes and outcomes around the state.

6.2.2.5.1 Policy Alignment Across Programs

Though verification policies are similar across CalFresh and CalWORKs, there are important differences that can be confusing for clients who participate in both programs. These differences can also be hard for county workers to navigate, sometimes resulting in workers using more burdensome verification methods than are required by law. While there may be some instances where different policies are required under federal law, or otherwise determined to be in the best interest of meeting program goals, we recommend CDSS capitalize on opportunities to align CalFresh and CalWORKs verification policies. We recommend CDSS undertake a comprehensive review of existing regulations and guidance and use the standard administrative procedures to promulgate updated, aligned rules. Examples of opportunities for alignment include the following:

- Establish clear and consistent requirements and guidance regarding verification methods and hierarchies. For example, explore the need for clarification of when electronic data sources, collateral contacts, and client attestations can be sufficient to confirm a client's statements on an application or report, with paper documentation required only when these methods are unavailable or information is questionable.
- Align verification requirements between CalFresh and CalWORKs where possible. For example, to the extent there are differences between the programs as to which eligibility factors need to be

verified, what forms of verification are acceptable, and what needs to be documented in the case record, consider aligning those policies in a manner that reduces burdens for clients and program staff.

- Explore alignment with Medi-Cal where possible. Medi-Cal has adopted a variety of verification methods that result in streamlined verification processes, such as allowing for reasonably compatible verification results, pre-populated renewals, and automated renewals based on *ex parte* review of available data.[70] Similar approaches could be considered in CalFresh and/or CalWORKs, subject to federal requirements.

6.2.2.5.2 Policy Alignment Between Eligibility and Performance Monitoring

As discussed above (see section 5.1.2), county workers may seek more or different forms of verification than required under eligibility policy in an effort to ensure that they have documented the case sufficiently to meet performance-monitoring standards. Doing so may be perceived as helping to reduce their error rate, but may also result in clients being asked to provide more verifications than required, resulting in processing delays. This pattern of over-verification may be reinforced by performance metrics or recognition of those with low error rates. Policy alternatives could help to address these challenges:

- Clarify where there is alignment between eligibility and performance-monitoring standards and where the state has made intentional decisions not to align them, in the best interest of meeting other program goals. Provide training to educate county workers.
- Collaborate with other states and organizations such as the American Public Human Services Association (APHSA) to develop common solutions to current federal QC requirements that may encourage over-verification.

- Promote alignment of performance-monitoring standards at the state and county levels where possible, including reviews based on what was reasonable at the time eligibility was determined, rather than what information was available at the time of review.
- Promote tracking and evaluation of performance metrics of over-verification, processing time, and customer service.

6.2.2.5.3 Policies Regarding Historic Data

County workers' exposure to historic data – data that is too old to be useful for eligibility purposes – raises unnecessary questions that often result in over-verification and negative verifications. As noted above (see section 6.1.2.2), limiting "pushes" of older, less relevant Recipient IEVS results is one way to address this concern. The adverse effects of historic data can be further addressed through policy. Examples include the following:

- Establish, and align across programs where possible, clear rules about when data should be disregarded as historic data. These rules will likely need to vary by data source and by eligibility factor. For example, CDSS could prohibit workers from asking about income that had been reported in a prior case that was closed more than three months ago. CalFresh policy that requires county workers to issue a written request for verification when they receive mid-period unclear information that is less than 60 days old may serve as a model;[71]
- Clarify, and align across programs where possible, standards regarding "questionable" circumstances that require verification, including when historic data is involved. These clarifications can help to guide county workers about how to appropriately exercise their discretion to work with clients to satisfy verification requirements, which may reduce patterns of over-verification. Options to explore include the following:

- Clarify that property/resource verification data (e.g., data about a car or bank account) that is at least a year old is not sufficient reason to consider a client's statement "questionable;"
- Clarify circumstances under which historic data relating to household composition is not considered questionable.

6.2.2.5.4 Policies Regarding Income Verification and Prospective Budgeting

In the future environment, more current income data will be available faster. Even with that improvement in place, current policies and practices may continue to encourage the routine use of paper documentation of income. We recommend that CDSS review existing federal requirements for verifying income and for prospective budgeting to ensure that the necessary steps are sufficiently clear and distinct in state regulations, procedural guidance, and training curriculum to promote program goals for accuracy and access.

Paper documentation of income is an example of policy clarification CDSS can explore. No federal eligibility, verification, or prospective budgeting provision explicitly requires paper documentation of the most recent 30 days of income.[72] Yet in practice, stakeholders report that clients must provide paper documentation of the current month's income, even if monthly income could be verified in real time from electronic data sources such as Work Number.

6.2.3 Improve Within the Current Environment

Many of the recommendations presented in the previous section could also help to identify opportunities for CDSS to streamline CalFresh and CalWORKs verification processes within the current environment, without waiting for the new state hub or other technology changes to be implemented. These efforts may further help to lay the foundation for future changes.

6.2.3.1 Initiatives to Address the Needs of Specified Populations

We recommend that CDSS work with stakeholders to design and implement initiatives that address specific barriers faced by certain eligible client populations, including clients who are college students, non-citizens, and/or homeless. Initiatives to explore in order to help these populations include the following:

- Further simplify verification requirements for homeless applicants, including reducing the need for paper documentation and greater use of self-attestation and collateral contacts;
- Encourage wider use of specialized eligibility units for homeless clients and college students;
- Reduce verification burdens by increasing reliance on categorical eligibility rules, such as categorical CalFresh eligibility for individuals who receive General Assistance/Relief;
- Simplify verification requirements for college students and streamline data sharing with colleges and universities;
- Develop and monitor specific performance metrics to assess outcomes, patterns of verification, and under-participation in CalFresh and CalWORKs for these populations so that evidence-based improvements can be made over time; and
- Formalize mechanisms for working with stakeholders to streamline processes for these populations, such as a stakeholder group focused on eligibility for non-citizens and populations with limited English proficiency.

6.2.3.2 Training

As the environment that supports CalFresh and CalWORKs evolves, training for county workers will, of course, be required. We recommend that CDSS develop a statewide verification training curriculum, including easy-to-use training materials and “cheat sheets” to help county workers – as well as clients – navigate the verification rules and process. A statewide curriculum

would reduce duplicative efforts among counties and promote statewide alignment of policy and practice. We recommend CDSS integrate its functions for developing regulations, procedural guidance, and training curriculum so that as policy changes, the procedural impacts and staff development needs are also considered and addressed.

In the current environment, there are opportunities to promote fast, accurate, and efficient verification processes through training. Recommended topics for training include at least the following:

- **Applicant IEVS electronic abstract.** Some workers continue to rely on the Applicant IEVS paper abstract. The electronic abstract is available faster. Training on the availability of the electronic abstract and proper approaches to documenting electronic results in the case file could help decrease processing times.
- **Client statements.** Certain eligibility factors can be considered verified based on the client's statement unless something is "questionable." There is variation in how county workers understand the term "questionable" and how to apply it on a case-by-case basis, sometimes resulting in requests for negative verifications. In addition to limiting Recipient IEVS "pushes" and clarifying policies regarding historic data that can raise verification questions unnecessarily, training could help to reduce over-verification when client statements are sufficient.
- **Specified populations.** Consistent with the above recommendations, training could help to address specific barriers faced by certain eligible client populations, including clients who are college students, non-citizens, and/or homeless.

6.2.3.3 Testing and Analytics

In the current environment, there is a lack of administrative data about verification practices and outcomes to guide decision-making. Going forward, as verification goals and priorities are identified, we recommend CDSS identify specific performance metrics so that analytic capabilities to monitor

performance can be adopted into the environment. We also recommend that CDSS review all currently available administrative data and, consistent with the statewide vision for CalFresh and CalWORKs eligibility, establish a baseline against which future performance can be measured.

6.3 MEDIUM-TERM RECOMMENDATIONS (YEARS 3-5)

For the second phase of the effort, during Years 3-5, we recommend that CDSS continue to implement and build upon the improvements recommended for the first phase. In particular, we recommend that CDSS evaluate learnings from the proof-of-concept effort and update the Roadmap as needed based on those learnings. This effort should result in a detailed plan for the Years 3-5 timeframe that includes: an updated governance model; a plan for continuous monitoring and improvement in technology, policy, and operations; and additional user-centered design initiatives.

Technical efforts during this phase should focus on design, development, testing, and implementation of the Direct Access approach to the state hub. We recommend beginning with piloting access for county workers and other authorized users (e.g., authorized staff of programs such as WIC; consumers) before launching statewide. As implementation proceeds, we recommend gradually migrating additional data matches, such as those currently performed via Applicant IEVS and Recipient IEVS, onto the state hub. Implementation should be carefully monitored, with transparency for stakeholders. We also recommend continuing to refine access controls, filtering logic, and other functionality based on results from continuous performance monitoring.

Meanwhile, planning for design, development, testing, and implementation of integration between the state hub and CalSAWS should also be completed during this phase.

6.4 LONG-TERM RECOMMENDATIONS (YEARS 6-10)

For the third phase of effort, during Years 6-10, we recommend that CDSS continue to implement and build upon the improvements recommended for the first and second phases, updating plans as appropriate based on learnings from user-centered design and performance measurement during the earlier phases.

Technical efforts during this phase should focus on execution of the plan for design, development, testing and implementation of integration between the state hub and CalSAWS. Direct Access for county workers should be maintained after CalSAWS integration in order to provide workers with flexibility (e.g., continued access to state hub in the event CalSAWS is temporarily unavailable). Direct Access should also provide continued access for non-SAWS authorized users. Implementation of both Direct Access and SAWS integration should be carefully monitored, with transparency for stakeholders. Refinements should be made based on results from continuous performance monitoring.

7 Conclusion

CDSS and its partners across the state have come a long way in streamlining eligibility and enrollment for California's vulnerable families, but also know there is more to do. To that end, this Roadmap report summarizes the activities, methodology, and results of the State Hub Roadmap project. It describes the current environment that supports CalFresh and CalWORKs verifications and captures key findings about the challenges in the current environment that impede fast, accurate, and efficient verifications for clients and program staff. It identifies many opportunities for improvement and provides recommendations for CDSS, working with other partners and stakeholders, to pursue in the near, medium, and long term. These recommendations center on: having a clear, statewide vision for CalFresh and CalWORKs eligibility; formal governance structures to ensure coordination on matters of shared importance and value across agencies, departments, programs, systems, and stakeholders; and a combination of technical and non-technical solutions. Ultimately, CDSS, working with partners and stakeholders, will make final decisions about the recommendations in this Roadmap and execute changes to streamline the verification process for clients and program staff.

The advancement and modernization of the verification processes for CalFresh and CalWORKS will have a meaningful impact on the health and human services program landscape in California, with positive effects spanning across program staff, agency partners, and clients. A smart, effective shift has the potential to save millions of dollars and countless hours in operations, align several agencies' goals and systems, and quickly, easily, and efficiently connect Californians to the critical benefits they need.

8 Appendix A: Acronyms

ABAWD	Able-Bodied Adult Without Dependents
APHSA	American Public Human Services Association
Applicant IEVS	Applicant Income and Eligibility Verification System
API	Application Programming Interface
AR/CO	Annual Reporting/Child Only
AU	Assistance Unit
BBCE	Broad-Based Categorical Eligibility
BEER	Beneficiary Earnings Exchange Record
CA-EDRS	California Electronic Death Registration System
CAIR2	California Immunization Registry
CalACES	California Automated Consortium Eligibility System
CalHEERS	California Healthcare Eligibility, Enrollment, and Retention System
CalSAWS	California Statewide Automated Welfare System
CalWIN	CalWORKs Information Network
CalWORKS	California Work Opportunity and Responsibility to Kids
CDPH	California Department of Public Health
CDSS	California Department of Social Services
CDT	California Department of Technology
CHHS	California Health and Human Services Agency
CIN	Client Index Number
C-IV	Consortium IV
DHCS	California Department of Health Care Services
DI	Disability Insurance
DOB	Date of Birth
EBT	Electronic Benefits Transfer
EDBC	Eligibility Determination and Benefit Calculation
EDD	Employment Development Department
EDRS	Electronic Disqualified Recipient System
ESB	Enterprise Service Bus

FDSH	Federal Data Services Hub
FPL	Federal Poverty Level
FTB	Franchise Tax Board
FTI	Federal Tax Information
ICT	Inter-County Transfer
IDR	Intelligent Document Recognition
IFD	Integrated Fraud Detection
IEVS	Income and Eligibility Verification System
IHSS	In-Home Supportive Services
IPV	Intentional Program Violation
IRS	Internal Revenue Service
IRT	Income Reporting Threshold
LEADER	Los Angeles Eligibility, Automated Determination, Evaluation and Reporting
LRS	LEADER Replacement System
MARS-E	Minimum Acceptable Risk Standards for Exchanges
MBSAC	Minimum Basic Standard of Adequate Care
MEDS	Medi-Cal Eligibility Data System
MMEF	Medi-Cal Master Extract File
OCR	Optical Character Recognition
PVS	Payment Verification System
QA	Quality Assurance
QC	Quality Control
Recipient IEVS	Recipient Income and Eligibility Verification System
RSDI	Retirement, Survivors, Disability Insurance
SAVE	Systematic Alien Verification for Entitlements Program
SAWS	Statewide Automated Welfare System
SAR	Semi-Annual Reporting
SFT	Secure File Transfer
SNAP	Supplemental Nutrition Assistance Program
SOLQ-I	State Online Query Internet
SSA	Social Security Administration

SSN	Social Security Number
TANF	Temporary Assistance for Needy Families
UI	Unemployment Insurance
USCIS	U.S. Citizenship and Immigration Services
VCI	Verify Current Income
VUR	Verified Upon Receipt
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

9 Endnotes

1 We extend our appreciation to key staff at CDSS and DHCS, who were critical in providing access to these documents as well as access to subject-matter experts who could help answer questions related to these documents.

2 This assessment reflected a relative order of magnitude of state costs. We did not perform a market analysis, examine cost-allocation details, conduct time studies, estimate savings, or otherwise perform detailed cost-benefit analyses of individual alternatives. Such analyses were beyond the scope of the current project and are assumed to be part of future phases of effort.

3 Title 7 of Code of Federal Regulations (C.F.R.) Section 273.9(a)(2)(i).

4 7 C.F.R. § 273.9(a)(stating categorically eligible individuals do not have to meet the gross or net income standards for other Supplemental Nutrition Assistance Program (SNAP) households). California elected the SNAP option of Broad-Based Categorical Eligibility (BBCE) which allows individuals who only receive non-cash Temporary Assistance to Needy Families (TANF) services, such as child care, to be categorically eligible for SNAP. 7 C.F.R. §§ 273.2(j)(2)(i)(B), 273.2(j)(2)(i)(C). Federal guidance clarified that individuals eligible under BBCE must have a household income below 200% FPL to be eligible for SNAP. "Clarification on Characteristics of Broad-Based Categorical Eligibility Programs Memo," United States Department of Agriculture (USDA), (December 27, 2016), accessible at: https://www.fns.usda.gov/snap/clarification-characteristics-broad-based-categorical-eligibility-programs-memo

5 California Welfare and Institutions Code (WIC) Sections 11250,11253,11450.12(a), 11452; California Manual of Policies and Procedures (MPP) Sections 44.207(income eligibility), 44-209.2 (eligible individuals).

6 CalFresh simplified reporting rules are at: 7 C.F.R. § 273.12(a)(5), WIC § 18910. CalWORKs simplified reporting rules are at: WIC § 11265.1. See also, “Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs,” California Department of Social Services (CDSS), All County Letter (ACL) 12-25, (May 17, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf. Exceptions to this frequency exist for households comprised solely of elderly and/or disabled members for CalFresh, or for child-only cases for CalWORKs. 7 C.F.R. § 273.12(a)(5)(iii)(B)(CalFresh); WIC § 11265.45(a)(CalWORKs).

7 7 C.F.R. § 273.2(f); MPP § 63-300.5(h). Under federal rules for SNAP, “mandatory” verification is required for the following: a) identity; b) Social Security number; c) gross non-exempt income (“countable income”); d) citizenship or immigration status; e)

residency; f) household composition. If claimed on the application, the following must also be verified: a) disability; b) child support; c) student exemption. All other criteria can be verified at either the state's option or if questionable. 7 C.F.R. § 273.2(f)(3). For example, certain expenses – such as shelter costs and child-care expenses – can be deducted from gross income to help meet income eligibility limits. Other expenses, such as utility and medical, can help increase the benefit calculation, but are not required for an eligibility determination. California has opted to use a Standard Utility Allowance (SUA) so that only individuals who want to claim a higher utility cost must provide documentation. 7 C.F.R. § 273.9(d)(6)(iii)(C); MPP §§ 63-502.363(a)(1) and (b). CalWORKs also requires verification of school attendance and immunizations for children in the household. WIC §§ 11253.5,11265.8; MPP § 40-105.

8 7 C.F.R. §§ 273.2(f)(4), 273.2(f)(5)(ii); MPP § 63.300.5(h).

9 7 C.F.R. § 273.2(c)(1)(i)(SNAP); Title 45 of Code of Federal Regulations (C.F.R.) Section 206.10(a)(1)(ii)(TANF). Application by phone is not commonly available at present time, but may become more common as counties expand their implementations of electronic signatures.

10 7 C.F.R. § 273.2(c)(1)(iii)(SNAP); See "Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs (SAWS 2 PLUS)," CDSS, page 1, accessible at: http://www.cdss.ca.gov/cdssweb/entres/forms/English/SAWS2PLUS.pdf (instructing applicants for CalWORKs to answer additional questions such as receipt of prior aid, race, ethnicity, primary language, interview preferences, and immediate need).

11 Written notice of verification requirements must be provided at the time of initial certification/application and at recertification/redetermination. Title 7 of the United States Code Section 2020(e)(3); 7 C.F.R. § 273.2(c)(5)(SNAP); 45 C.F.R. § 206.10(a)(2)(i)(TANF); See e.g., "Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs (SAWS 2 PLUS)," CDSS, page 2, accessible at: http://www.cdss.ca.gov/cdssweb/entres/forms/English/SAWS2PLUS.pdf

12 See e.g., "Common Place Handbook, Chapter 44, Section 44.2," Social Services Agency of Santa Clara County, (June 5, 2008), accessible at: https://www.sccgov.org/sites/ssa/debs/Pages/policy-common-place.aspx

13 MPP §§ 20-006.2, 40-181.4, 63-300.5(m).

14 MPP § 20-006.5.

15 7 C.F.R. § 273.2(b)(2)(requiring states that use IEVS for verification must notify clients that their information will be electronically verified and that they will need to resolve any discrepancies between the data from electronic sources and the information they provided); MPP § 63-300.5(a)(2).

16 7 C.F.R. § 273.2(f)(5)(i); MPP §§ 40-105.12, 63-300.37; See also, "Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs (SAWS 2 PLUS)," CDSS, accessible at: http://www.cdss.ca.gov/cdssweb/entres/forms/English/SAWS2PLUS.pdf; See also SAWS consumer portals at: MyBenefitsCalWIN; YourBenefitsNow!, C4Yourself.

17 7 C.F.R. §§ 273.2(f), 273.2(h)(1)(i)(C); MPP § 63-300.5(a)(2)(C).

18 Under federal SNAP rules, the state must establish guidelines for what constitutes questionable information. These requests and guidelines must not discriminate based on race, religion, ethnic background, or national origin. 7 C.F.R. § 273.2(f)(2)(i).

19 7 C.F.R. § 273.2(f)(2); MPP § 63-300.5(g).

20 For CalFresh interview requirements, see 7 C.F.R. § 273.12(e); WIC § 18901.10; MPP § 63-300.4. For CalWORKs interview requirements, see WIC § 11052.5(a); MPP § 40-131.11.

21 7 C.F.R. § 273.10; WIC § 11265.1; "Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25, (May 17, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf (stating income is reasonably anticipated when the client and county worker determine it is reasonably certain that the client will receive a specified amount of monthly income in the SAR payment period); See also, "Correction to All County Letter (ACL) 12-25, Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25E, (December 16, 2013), accessible at: http://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acl/2012/12-25E.pdf

22 County workers do not need to wait for the results from Applicant IEVS to determine eligibility for immediate-need cases or if they have documentary evidence from the client for all eligibility criteria. MPP § 20-006.4.

23 7 C.F.R. § 273.12(a)(5)(iii)(B)(stating CalFresh households in which all adult members are elderly or have a disability with no earned income, and are certified for periods lasting between 13 and 24 months, must file a periodic report once a year); WIC § 11265.45(a)(stating a CalWORKs assistance unit that does not include an eligible adult shall not be subject to periodic reporting requirements other than the annual redetermination); See also, "California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs: Implementation of the Annual Reporting/Child Only (AR/CO) System," CDSS, ACL 12-49, (September 27, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-49.pdf

24 7 C.F.R. § 273.12(a)(5)(iii)(C)(stating periodic report form must request information on any change in circumstances listed at § 273.12(a)(1)); MPP §§ 40-181.24; 60-508.3.

25 7 C.F.R. § 273.12(a)(5)(iii)(E)(10-day reminder notice); MPP §§ 40-181.221(a), 63-504.27, 63-504.33.

26 7 C.F.R. §273.12(a)(5)(iii)(E); MPP §§ 63-504.361(b), 44-316.21.

27 Benefits can be reinstated if the client submits the report or files an appeal before the end of the issuance month. 7 C.F.R. §§ 273.12(a)(5)(iii)(F), 273.17(restoration of benefits); WIC § 11265.1(f)(requiring good cause if SAR 7 submitted after due date for reinstatement of benefits); MPP §§ 40-181.234, 63-508.643.

28 7 C.F.R. § 273.12(5)(iii)(D); MPP §§ 40-173, 40-181, 44-316.22, 44-325, 63-504.26.

29 7 C.F.R. §§ 273.2(f)(8)(i), 273.14; WIC § 11265(a); MPP § 63-504.

30 For CalFresh requirements, see 7 C.F.R. §§ 273.2(f)(8)(i), 273.14(b)(2), 273.14(b)(4). For CalWORKs requirements, see WIC § 11265(a); MPP § 40-131.

31 7 C.F.R. §§ 273.2(f)(8)(i)(D), 273.14; MPP §§ 40-181.1(a)(2)(SAR), 40-181.1(e)(3).

32 7 C.F.R. § 273.2(b)(2); MPP §§ 40-181.1(4), 63-300.22.

33 For details on "Simplified Reporting" under CalFresh, see 7 C.F.R. § 273.12(a)(5); "Supplemental Nutrition Assistance Program (SNAP) - Simplified Reporting Provisions in the FSRIA Final Rule," Food and Nutrition Services (FNS), March 25, 2010, accessible at: https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap-simplified-reporting-provisions-fsria-final-rule; WIC § 18910(f)(1). For details on Simplified Reporting under CalWORKs, see WIC § 11265.1; "Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25, (May 17, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf

34 "Correction to All County Letter (ACL) 12-25, Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25E, (December 16, 2013), accessible at: http://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acl/2012/12-25E.pdf; "Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25, (May 17, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf

35 7 C.F.R. §§ 273.2(f)(8)(ii), 273.12(a)(2); WIC § 11265.3(a); "Implementation of

the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25, (May 17, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf

36 7 C.F.R. §§ 273.12(a)(5)(v)(gross income over 130% FPL), 273.12(a)(1)(vii) (able-bodied adults subject to the time limits); See also 7 C.F.R. § 273.12(a)(5)(iii)(G) (exceptions to periodic reporting).

37 WIC § 11265.3; MPP §§ 40-103.9, 44-316.32.

38 7 C.F.R. § 273.12(a)(5)(iv); WIC § 11265.3(2)(h).

39 7 C.F.R. § 273.12(c)(3); "CalFresh Changes to County Welfare Department Action on Unclear Information Received Mid-Period," CDSS, ACL 18-20, (February 28, 2018), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2018/18-20.pdf?ver=2018-03-01-142239-037. For CalFresh, information older than 60 days can be clarified at the next certification period (unless it is from a source that is Verified Upon Receipt or "VUR"). For the definition of "VUR", see 7 C.F.R. § 273.12(a)(5)(vi)(B)(2); MPP § 20-006.53.

40 7 C.F.R. §§ 273.12(a)(5)(vi)(B)(state agency action reported outside of a periodic report if increase in benefits), 273.12(c)(1)(iii)(state option to verify changes if increase benefits); WIC § 11265.3(f)(if verified); MPP §§ 44-316.31, 63-509(d). Note that for CalFresh, county workers must act on information that is verified, regardless of whether the action results in an increase or decrease in CalFresh benefits. If a county worker receives verification (i.e., supporting documentation) of information indicating a change in household circumstances, the county worker must act. For this reason, county workers should first assess the impact of a voluntary report before verifying the information.

41 See e.g., MPP §§ 63.509(b), 63-509(c), 63-509(j); "Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh Programs," CDSS, ACL 12-25, (May 17, 2012), accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf. Note that no action is required if the household makes a mandatory report for another public assistance program and the report does not trigger action in that other program, but results in a decrease in the household's CalFresh benefits.

42 7 C.F.R. § 273.12(a)(5)(vi)(A); WIC § 11265.3(d); MPP §§ 44-316.32, 63.509(c).

43 7 C.F.R. §§ 273.12(c), 273.12(e); MPP §§ 44-316.33(CalWORKs), 63-509(h) (CalFresh); "Implementation of the Semi-Annual Reporting (SAR) System in the California Work Opportunity And Responsibility To Kids (CalWORKs) and CalFresh

Programs," CDSS, ACL 12-25, (May 17, 2012), pages 66-67, accessible at: http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2012/12-25.pdf.

44 7 C.F.R. § 273.12(a)(5)(vi)(B)(1); MPP §§ 44-316.31, 63-509(d).

45 7 C.F.R. § 273.12(c)(1)(iii); WIC § 11265.3(h); MPP §§ 44-316.311, 63-509(d)(3).

46 7 C.F.R. §§ 273.2(f)(9)(v), 273.13; MPP §§ 20-006.543(b)(1)(CalFresh only cases), 40-181.221.

47 7 C.F.R. §§ 273.12(e)(4), 273.12(e)(5).

48 "Statewide Automated Welfare System," CDSS, accessible at: http://www.cdss.ca.gov/inforesources/SAWS; "Statewide Automated Welfare System: California's County Managed Public Assistance Eligibility & Enrollment System," California Welfare Directors Association of California (CWDA), page 5, accessible at: https://www.cwda.org/sites/main/files/file-attachments/statewide_automated_welfare_system_saws.pdf

49 Title 42 of the United States Code (U.S.C.) Section 1320b–7; 7 C.F.R. §§ 272.8, 273.2(f)(9); MPP § 20-006.1.11.

50 "Income Eligibility Verification System Applicant System," CDSS, accessible at: https://www.socialinterest.org/wp-content/uploads/2018/10/ievs_applicant_flowchart.pdf

51 MPP § 20-006.211.

52 MPP §§ 20-006.2, 40-181.4, 63-300.5(m).

53 7 C.F.R. § 273.2(f)(9)(i).

54 "Recipient IEVS flowchart," CDSS, accessible at: https://www.socialinterest.org/wp-content/uploads/2018/10/ievs_recipient_flowchart.pdf; "Recipient IEVS match chart," CDSS, accessible at: https://www.socialinterest.org/wp-content/uploads/2018/10/ievs_recipient_match_chart.pdf

55 See e.g., "CalWORKs and CalFresh: Recipient Income and Eligibility Verification System (IEVS) Processing Timeframes," CDSS, ACL 17-41, (June 6, 2017), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2017/17-41.pdf?ver=2017-06-08-091640-630

56 7 C.F.R. § 275.10. States must follow the procedures outlined in FNS' Quality Control Review Handbook. 7 C.F.R. § 275.14(b); FNS handbook accessible at: https://www.fns.usda.gov/snap/fns-handbook-310-snap-quality-control

57 A state is liable to the federal government for 65% to 100% of the amount of overissuances/overpayments, depending on the type of error (Intentional Program Violation (IPV), Inadvertent Household Error (IHE), and Administrative Error (AE)). 7 C.F.R. § 273.18(k). In addition, a state is liable to the federal government if the state's

overall payment error rate "exceeds the National performance measure" that is set by FNS each year. 7 C.F.R § 275.23(d). The state and the counties share the cost of the federal penalties for CalFresh. WIC § 10544(b).

58 7 C.F.R. § 275.5(federal requirement for Management Evaluation); 7 C.F.R. §275.24(b)(outlining performance factors for which FNS evaluates the state).

59 The three SAWS consumer portals are available in English and Spanish. The portals also provide some information in other languages, including information about how to access language support. For example, "MyBenefitsCalWIN," includes materials in: Arabic, Armenian, Chinese, Hmong, Japanese, Khmer, Korean, Lao, Mienh, Persian, Portuguese, Russian, Tagalog, and Vietnamese. Materials at "C4Yourself" are available in: Armenian, Cambodian, Cantonese, Hmong, Korean, Lao, Mandarin, Russian, Tagalog, and Vietnamese and in the "YourBenefitsNow!" portal, materials are available in: Armenian, Chinese, Khmer, Korean, Russian, Tagalog, and Vietnamese.

60 Due to this processing delay, county workers are not using Applicant IEVS results to determine eligibility for a new application, relying instead on documentation from the client. Applicant IEVS instead is primarily used by the counties to monitor continued eligibility and potential overissuances after an application has been approved.

61 The State On-line Query/State On-line Query-Internet (SOLQ/SOLQ-I) provides states real-time access to Social Security Administration's (SSA) Social Security Number (SSN) verification service and retrieval of Title 2 and/or Title 16 data. See e.g., "Data Exchange Applications," Social Security Administration (SSA), accessible at: https://www.ssa.gov/dataexchange/applications.html. See also, "The State Verification & Exchange System (SVES) and State On-line Query (SOLQ) Manual," SSA, July 2017, accessible at: https://www.ssa.gov/dataexchange/documents/sves_solq_manual_July_2017.pdf; "Information Exchange Agreement Between The Social Security Administration (SSA) and The [Name of State](State)," SSA, accessible at: https://www.ssa.gov/dataexchange/documents/IEA(F)%20State%20Level%2005-31-2013.pdf

62 See e.g., "CalWORKs and CalFresh: Recipient Income Eligibility Verification System Processing Timeframes," CDSS, ACL 17-41, (June 6, 2017), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2017/17-41.pdf?ver=2017-06-08-091640-630; "California Work Opportunity And Responsibility To Kids (CalWORKs) And CalFresh: Criminal Prosecution Of Intentional Program Violation (IPV) Timeframes," CDSS, ACL 18-22, (March 27, 2018), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2018/18-22.pdf?ver=2018-03-29-104012-523

63 Ibid.

64 See e.g., 7 C.F.R. § 273.12(c)(3)(ii); "CalFresh Changes to County Welfare Department Action on Unclear Information Received Mid-Period," CDSS, ACL 18-20,

(February 28, 2018), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2018/18-20.pdf?ver=2018-03-01-142239-037 (stating that unclear data received in between required reporting periods that is more than 60 days old does not require review by the county worker until the next reporting period - semi-annual or annual).

65 As of May 2018, county workers must use the Systematic Alien Verification of Eligibility's (SAVE) online portal, rather than a paper form, to submit primary and secondary verification of immigration status. See "Elimination of the Manual SAVE Verification Process and Implementation of the Electronic SAVE Verification Process," California Department of Health Care Services (DHCS), Medi-Cal Eligibility Division Information Letter (MEDIL) 17-14, (September 8, 2017), accessible at: http://www.dhcs.ca.gov/services/medi-cal/eligibility/Documents/MEDIL/2017/I17-14.pdf

66 Since June 2017, the receiving county may not conduct an interview or ask clients who are moving from another county to provide documentation that they had already provided until the household's next periodic report or recertification/redetermination date. WIC §§ 10003(d)(CalWORKs), 11053.2(d)(CalFresh). See also, "California Work Opportunity And Responsibility To Kids (CalWORKs) And CalFresh Programs: Changes To The Inter-County Transfer (ICT) Process As A Result Of Senate Bill (SB) 1339, Revised And New Notice Of Action (NOA) Messages," CDSS, ACL 17-58, (June 23, 2017), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2017/17-58.pdf?ver=2017-06-26-140153-710

67 "Frequently Asked Questions (FAQs): States' Use of the SSA Data Set Via the Centers for Medicare and Medicaid Services' (CMS) Hub for Supplemental Nutrition Assistance (SNAP) and Temporary Assistance for Needy Families (TANF) Eligibility," Centers for Medicare and Medicaid Services (CMS), January 19, 2017.

68 "Volume II: Minimum Acceptable Risk Standards for Exchanges, Version 2.0," CMS, (November 10, 2015), accessible at: https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2-MARS-E-v2-0-Minimum-Acceptable-Risk-Standards-for-Exchanges-11102015.pdf

69 See e.g., "Eligibility A-Z Manual," Washington State Department of Social and Health Services, Economic Services Administration, accessible at: https://www.dshs.wa.gov/esa/manuals/eaz; "Supplemental Nutrition Assistance Program (SNAP) Source Book," New York Office of Temporary and Disability Assistance, accessible at: http://otda.ny.gov/programs/snap/SNAPSB.pdf

70 See e.g., Brooks, Tricia, "New Brief Highlights States' Experiences in Implementing Ex Parte Renewals in Medicaid and CHIP," Center for Children & Families (CCF) of the Georgetown University Health Policy Institute, (April 7, 2016), accessible at: https://ccf.georgetown.edu/2016/04/07/states-experiences-implementing-ex-parte-renewals-

medicaid-chip/

71 7 C.F.R. § 273.12(c)(3); "CalFresh Changes to County Welfare Department Action on Unclear Information Received Mid-Period," CDSS, ACL 18-20, (February 28, 2018), accessible at: http://www.cdss.ca.gov/Portals/9/ACL/2018/18-20.pdf?ver=2018-03-01-142239-037. For CalFresh, information older than 60 days can be clarified at the next certification period (unless it is from a source that is Verified Upon Receipt [VUR]).

72 See e.g., 7 C.F.R. § 273.10 ("A household's eligibility shall be determined for the month of application by considering the household's circumstances for the entire month of application."); 7 C.F.R § 273.2(f)(1)(i)(stating "Gross nonexempt income shall be verified for all households prior to certification. However, where all attempts to verify the income have been unsuccessful because the person or organization providing the income has failed to cooperate with the household and the State agency, and all other sources of verification are unavailable, the eligibility worker shall determine an amount to be used for certification purposes based on the best available information."); 7 C.F.R. § 273.10(c)(stating "Income received during the past 30 days shall be used as an indicator of the income that is and will be available to the household during the certification period. However, the State agency shall not use past income as an indicator of income anticipated for the certification period if changes in income have occurred or can be anticipated.")